

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

VALMIKI RAMANI

20 CV 1732

Write the full name of each plaintiff.

(Include case number if one has been assigned)

-against-

Amazon.com

COMPLAINT

Do you want a jury trial?

☐ Yes ☒ No

Write the full name of each defendant. If you need more space, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section II.

NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

☐ Federal Question

☒ Diversity of Citizenship

A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?

B. If you checked Diversity of Citizenship

1. Citizenship of the parties

Of what State is each party a citizen?

The plaintiff, VALMIK RAMANI, is a citizen of the State of
(Plaintiff's name)

new york state
(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

If the defendant is an individual:

The defendant, Amazon.Com, is a citizen of the State of
(Defendant's name)

Seattle - Oregon WA 98109

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

If the defendant is a corporation:

The defendant, Amazon.Com, is incorporated under the laws of

the State of Seattle - Oregon WA 98109 WA 98109

and has its principal place of business in the State of Seattle Oregon

or is incorporated under the laws of (foreign state) _____

and has its principal place of business in _____

If more than one defendant is named in the complaint, attach additional pages providing information for each additional defendant.

II. PARTIES

A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional pages if needed.

VALMIKI D RAMAKRISHNAN
First Name Middle Initial Last Name

139-D5 85 DR 6D

Street Address

BRIARWOOD

County, City

718-291-2978

Telephone Number

WA
State

11435
Zip Code

VALMIKI DR@gmail.Com
Email Address (if available)

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1:

Amazon.com
 First Name Last Name
410 Terry Ave North Seattle WA 98109
 Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

Defendant 2:

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

Defendant 3:

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

Defendant 4:

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

III. STATEMENT OF CLAIM

Place(s) of occurrence: New York City - County QueensDate(s) of occurrence: September

FACTS:

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

Bought in stock Gel Pack for pain Relief from Amazon.com, after third use while in use, the gel inside the pack poured out covering my abdomen, hip to upper leg area (as seen in attached pictures.) I initially suffered Red-Pink colour skin - of which my physician described as contact dermatitis, later brown patches arrived when the gel was on my body - to date one remains on my abdomen of which steroids cream cannot remove. I filed lawsuit against Defendant, but now due to bad advice my case is dismissed in favour of defendant attorney motion although I used the same mod. of service accepted as instructed in first suit, 60 days after, case was dismissed as service was deemed improper.

although this is how I was instructed to file the first lawsuit which was settled out of Court (file herein contained) Sixty days later lawsuit for \$25,000 was filed under same multi-occupant of service, and this has been deemed not acceptable and so my case was dismissed.

If the court will to inquire into to Amazon for they accept process of Civil Service the facts might prevail.

INJURIES:

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

I suffered initially Contact Dermatitis then large brown patches on my skin appeared. Now on my abdomen remains and steroid cream cannot remove.

IV. RELIEF

State briefly what money damages or other relief you want the court to order.

I am seeking monetary Relief for the above damage to my person as this Court would find suitable.

V. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

2-26-20
 Dated
Valmiki D
 First Name Middle Initial
139-05 85 DR
 Street Address
BRIARWOOD
 County, City State Zip Code
718-291-2978 NY 11435
 Telephone Number Email Address (if available)
VALMIKI.D.RA@gmail.com

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

☒ Yes ☐ No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.

US Court Southern District New York

VALMICKI Raman
Plaintiffv
Amazon.com
Defendant

After getting the notice that my case was dismissed (the Judge was negro, the defense attorney was a rookie of negro descent) I filled out the papers for an appeal but did not file them as I realise I have been wasting my time in the Civil Court and the my state Supreme Court. Therefore I have brought my case to this court as I know I can be assured of a Justifiably Review of my case. My papers were properly filled and I am left with a brown patch on my abdomen which is not going away despite the use of steroid cream. I have a permanent damage, and ask this court to take my case and award me what it deem fit for damages I endured as a Result of Amazon.com defective and toxic product, which they carry in stock.

Valmicki Raman

VALMICKI Raman

VALMIKI RAMANI
Plaintiff

Amazon.Com
defendant

Complaint

- ① To this court I hereby states, in July of 2019, I was assaulted by a Amazon delivery person. I filed a lawsuit in the Queens Civil Court for \$5,000. Their lawyers offered \$2,000 out of court settlement. I accepted, all files on this case is enclosed. I called Amazon.Com and was told they have a department setup just to handle civil suits, and did not accept personal service only via email and fax, which is how I pursued the lawsuit.
- ② Sixty days later I had reason to file another lawsuit against Amazon.Com, as the cool pack they sold me released all the gel in it and was on my abdomen down to my left thigh - butt area. I experienced contact dermatitis, and later developed three large brown patches where the gel was exposed to. To day the one on my abdomen remains and all steroid creams are not getting rid of it. I served (had) the summons and complaint the same way as before. Amazon sent their attorney to defend it on the grounds that service was not done properly, Amazon even changed their email address and fax number.

Amazon is the Largest Firm in the world it's owner is worth 140 Billion dollars, yet they would do anything to get out of selling me a cheap chinese made product that has caused me bodily harm.

③ I pursued the lawsuit (paper enclosed) in the Civil Court of Queens and eventually had it dismissed by a black judge in favour of the black attorney representing Amazon. I could never win a lawsuit in the Supreme Court or Civil Court in Jamaica Queens.

④ I am therefore asking for help in addressing the defective sold to me by Amazon. I am enclosing all files.

Valmiki Ram

VALMIKI RAM

Tele 718 291 2978

139-05-85-DR60

Email valmiki-dp@gmail.com Briarwood ny 11435

Civil Court of the City of New York

County of _____

Part _____

Index Number CV-031556-19/qa

VALMIKI RAMANI

Claimant(s)/Plaintiff(s)/Petitioner(s),

NOTICE OF APPEAL

-against-

Am AZOW.COM

Defendant(s)/Respondent(s)

PLEASE TAKE NOTICE that the Appellant, VALMIKI RAMANI
hereby appeals to the Appellate Term of the Supreme Court, First/Second Department, from
Strike one

the Order/Judgment by the Hon. Lance EVANS
Strike one

Judge of the Civil/Housing Court of the City of New York, entered in the office of the Clerk of
Strike one

said Court on Jan 16 2020, and from each and every part thereof.

Dated: 2-25-20

Appellant's Signature: Valmiki Ramani

Appellant's Name: VALMIKI RAMANI

To:

Tara Reeves

Address: 139-05 85 DR 6D

Davis WR 128 Trammie

BRIDGEWATER NY 11735

12516 Ave NY 10020

Appellant's Phone: 718-291-2978

INSTRUCTIONS FOR SERVICE

A party to the action cannot serve the Notice of Appeal. It must be served by some other person, 18 years of age or older. [CPLR 2103 (A)]

In the event the other party is represented by an attorney, you are required to have the Notice of Appeal served upon the attorney. After service has been made, the Affidavit of Service by Mail (item "A" below) must be completed by the person who served the papers and sworn to before a Notary Public.

In the event the other party is not represented by an attorney, you are required to have the Notice of Appeal served on the other side. After service has been completed, the Affidavit of Service by Mail (item "B" below) must be completed by the person who served the papers and sworn to before a Notary Public.

AFFIDAVIT OF SERVICE BY MAIL UPON THE PARTY'S ATTORNEY OR UPON A PARTY

State of new York) ss.:
County of Queens)

The undersigned being duly sworn, deposes and says:
He or she is not a party to the action, is over 18 years of age and resides at:

() A. That on 2-25, 2020 deponent served the within Notice of Appeal on Tia Reaver, Attorney(s) for Amazon.com in this action at Davis Wright T. Prama 1251 61st Ave 21st Fl NY 10020 the address designated by said attorney(s) for that purpose

() B. That on 2/25, 2020 deponent served the within Notice of Appeal upon the other party _____ in this action at _____ the address designated by said other party for that purpose by depositing a true copy of same enclosed in a postpaid properly addressed wrapper, in a post office depository under the exclusive care and custody of the United States Postal Service within the State of New York.

Sworn to before me
this 25 day of February 2020

NOTARY PUBLIC

ZLATA AKILOVA
Notary Public, State of New York
Reg. No. 01AK6355611
Qualified in Queens County
Commission Expires 03/13/2021

Suleyman
Signature

Milana Suleymanova
Print Name

Civil Court of the City of New York
County of Queens
Part 101

Index Number CV-031556-19/QU
Motion Cal # 1 Motion Seq. #
Papers Submitted to Special Term
on November 15, 2019

VALMIKI RAMANI,

Plaintiff(s),

against

AMAZON.COM,

Defendant(s)

DECISION/ORDER

Civil Court
of the
City of New York

JAN 16 2020

ENTERED
QUEENS COUNTY

Recitation, as required by CPLR §2219(a), of the papers considered in the review of this motion by the Patricia Rivers for an order granting stay the sale, destruction or disposition of the vehicle, the retention of which by a garage keeper is the subject of the proceeding.

Notice of Motion - Affidavits - Exhibits - Service

Notice of Motion Affirmations- Exhibits - Service

Papers
Numbered

1

2

The plaintiff *pro se* herein brings a motion seeking approval of his attempt to serve the summons and complaint in the underlying action. The Defendant moves to dismiss the complaint pursuant to CPLR 311(a)(1), 3211(a)(7), 3211(a)(8), and/or 3211(a). The movant's affidavit in support states that he was instructed (without providing the identification of the person) that service of his papers should be done by email and fax; that they do not accept personal service. The movant alleges that he followed the instruction and his papers were accepted by the same "firm" that represents the defendants in this law suit. The movant emphasizes that the defendants' present counsel are the same as the firm represented them in a law suit circa July 30, 2019. The movant asserts that the law firm's insistence that the service was defective is because this law suit's "demand for compensation damages is larger in this case". The movant revisited the series of steps undertaken in the July 30, 2019 law suit, which includes, inter alia, that he filed "a copy of service on July 30, 2019 with Rm. 147". Eventually, an out of court settlement was accomplished in that matter. The movant emphasizes that a comparison of the affidavit(s) of service in the July law suit with the affidavit of service dated September 26, 2019 in the instant

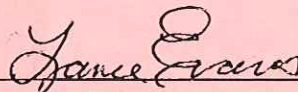
suit demonstrated that there is a dissimilarity. The affidavit of service under index no. CV-026077/19 dated 7/29/19 states that the summons with endorsed complaint was delivered to (206) 266-7010 subpoena-civil@ Amazon.com. Whereas, under index no. CV-031556/19, the affidavit of service states the summons with endorsed complaint was delivered via email to subpoena-civil @ Amazon.com. In either case, service does not comport with the CPLR.

In opposition to the motion, defendants argue the workings of CPLR 3211, specifically, inter alia, CPLR 3211(a)(8) in concert with CPLR 311(a)(1) which require personal service to be performed by personal delivery to a corporate officer or relative designate. In Defendant's memorandum of law, there is a focus paid upon the Plaintiff's prior action through his process server's delivery of that complaint via fax and email. Yet, the Defendant did settle that action with the Plaintiff. However, now Defendant takes umbrage by remonstrating that the Plaintiff's present service was defective when seemingly the only difference is that Plaintiff did not fax the summons and complaint. Nonetheless, the Court finds that the reasoning which allowed a settlement to occur with a similar type of service of process should not vitiate the statute, CPLR 311 (a)(1) and condone as well as elevate, the service herein to prosecute the instant complaint. In either case, service was deficient.

Accordingly, the Court finds that the Plaintiff failed to demonstrate compliance with CPLR 311(a)(1) and establish personal jurisdiction of the Court. The other arguments of the Defendant are not reached for consideration. As such, the complaint is dismissed.

The foregoing constitutes the decision and order of the Court.

Date: 12/17/19



HON. LANCE EVANS
Judge, Civil Court

Supreme Court of the State of New York

Appellate Term: Second Department

Request for Appellate Term Action [RATA] (Pursuant to 22 NYCRR 731.2 [a]) - Civil

Case Title: Set forth the title of the case as it appears on the summons, notice of petition or order to show cause by which the matter was or is to be commenced, or as amended.

VALMIKI RAMANI
-against-
Amazon - Com.

For Court of Original Instance

Date Notice of Appeal Filed

For Appellate Term

Case Type

☐ Small Claims ☐ Landlord & Tenant ☒ Civil ☐ No Fault

Appeal

Paper Appealed from:
(Check all that apply)☒ Judgment☐ Order☐ Decision

Court: CIVIL COURT	County: Queens
Dated: Jan 16 2020	Entered: Queens County
Judge (name in full): LANCE EVANS	Index No.: CV-031556-19/QU
	Trial: (Circle One) Yes <input checked="" type="radio"/> No <input type="radio"/>

Prior Appeals and Related Case Information

Are any appeals arising from the same action or proceeding currently pending in this court? (Circle One) Yes ☐ No ☒
If yes, please specify the Appellate Term Docket Number assigned to each appeal.

Where appropriate, indicate whether there is related action or proceeding pending in any court of this or any other jurisdiction, and if so, the status of the case:

NO

Original Proceeding

Commenced by:
(Check One)
☐ Order to Show Cause ☐ Notice of Petition and Petition ☒ Summons and Complaint ☐ Small Claims Complaint Form ☐ Other: _____

Date: OCT 23 2019

Description of Appeal

Description: Briefly describe the paper appealed from. If the appeal is from an order, specify the relief requested and whether the motion was granted or denied.

Decision / Order \$25,000 Complaint
/ motion dismissed Jan 16 2020

Issues: Specify the issues proposed to be raised on the appeal, the grounds for reversal, or modification to be advanced and the specific relief sought on appeal.

In July 2019 I was assaulted by an Amazon delivery man, Amazon instructed me to email or FAX summons-complaint so they do not accept personal service, sixty days later I filed another summons/complaint via same mode as previously instructed (see attached)

Party Information

Instructions: Fill in the name of each party to the action or proceeding (one name per line). Indicate the status of the party in the court of original instance and the status of the party in this court, if applicable. For parties with an attorney, check the "Represented" box; for parties without an attorney, check the "Pro Se" box. You must provide the address and phone number for all parties. Attach additional parties and their information on a separate sheet of paper.

No.	Party Name	Original Status	Appellate Term Status
1	Valmiki Raman	Plaintiff	Appellant

☐ Represented ☒ Pro Se

Attorney/Firm Name: (if applicable) Tara Reeves Davis - Wright - Traimere

Address: 1251 Ave J P.O. Americas

City: NYC State: NY Zip Code: 10020 Telephone:

E-Mail Address: Fax Number:

No.	Party Name	Original Status	Appellate Term Status
2			Respondent

☐ Represented ☐ Pro Se

Attorney/Firm Name: (if applicable)

Address:

City: State: Zip Code: Telephone:

E-Mail Address: Fax Number:

No.	Party Name	Original Status	Appellate Term Status
3			

☐ Represented ☐ Pro Se

Attorney/Firm Name: (if applicable)

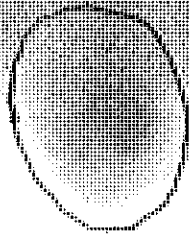
Address:

City: State: Zip Code: Telephone:

E-Mail Address: Fax Number:

Prof Albem circle is where
a Brown spot about one
inch in Diameter has
appeared.

Valenti Ramon



Exbit

C

INDEX NO: _____

AFFIDAVIT OF SERVICE
OF
NOTICE OF TRANSMITTAL
OF TRANSCRIPT

CIVIL COURT OF THE CITY OF NEW YORK
COUNTY OF QUEENS

V Almiki Roman Plaintiff(s)

-Against-

Amazon . Com Defendant(s)

State of New York)
County of Queens) ss.:

Milana Suleymanova, being duly sworn, deposes and says:
I am over 18 years of age and not a party to this action.

At 1:03 A.M. / P.M. on 25 Feb/2020 139-09 84 Drive 1A
(Time) (Date) (Address)
Babamwood, NY 11435 in the County of Queens

City of New York, I served the Notice of Transmittal of Transcript in this matter on:

100a Leaves-Davis Wright Tremeire 1251 64th Ave ny 10020
() A. Known to me to be the other party Defendant in this action at
1251 64th Ave ny 10020 21 FS, the address designated
by said other party for that purpose.

() B. Known to me to be the Attorney(s) for Amazon . Com
in this action at 1251 64th Ave ny 10020 21 FS
the address designated by said attorney(s) for that purpose by depositing a true copy of
same enclosed in a postpaid properly addressed wrapper, in a post office depository under
the exclusive care and custody of the United States Postal Service within the State of
New York.

Sworn to before me
this 25 day of February, 2020

[Signature]
Notary Public

ZLATA AKILOVA
Notary Public, State of New York
Reg. No. 01AK6355611
Qualified in Queens County
Commission Expires 03/13/2021

Suley
Signature
Milana Suleymanova
Print name here

Civil Court of the City of New York

County of _____

Index Number _____

VALMCKI RAMANI

Petitioner,

-against-

Amazon - Cor

Respondent.

NOTICE OF SETTLEMENT
OF TRANSCRIPT

To the Appeals Clerk, Civil Court, City of New York, County of Queens,

and to Amazon - Cor Respondent.

The above captioned case is to be settled before the Hon. Lance Evans

on 3 - 17 20 20

I have attached my list of objections/corrections to this Notice.

2 The respondent has provided a list of objections/corrections, and that list is attached.

_____ The respondent has not provided a list of objections/corrections.

(Initial the appropriate section above)

Dated: 2-25-20

Valmcki Ramani

Signature

139-0585 DR 68
Barwood my 11435

Address

CIV-GP-42A-i(Revised 4/04)

FREE CIVIL COURT FORM

No fee may be charged to fill in this form.

Form can be found at: <http://www.nycourts.gov/courts/nyc/civil/forms.shtml>.

Civil Court of the City of New York

County of _____

Index Number CV-031556-19/04

VALMIKI RAMANI

Claimant(s)/Plaintiff(s)/Petitioner(s)
-against-

Amazon.com

Defendant(s)/Respondent(s)

**NOTICE OF TRANSMITTAL
OF TRANSCRIPT**

TO: Appeals

The enclosed transcript is being forwarded to you, the appellee, following Section 1704 of the Civil Court Act together with a copy of the proposed amendments.

Within fifteen (15) days of service you shall make any proposed amendments or objections to the transcript and serve them on the appellant.

The amendments or objections are to be made by referring to the page and line number in the transcript and specifying the change. For example, if the transcript says that the time that an incident occurred was 3:30 P.M. when the testimony given at the trial was 2:30 P.M., label a piece of paper Proposed Amendments and Objections, list the page, the line number and the proposed amendment.

You must return a copy of the proposed amendments to the appellant. Be sure to serve the proposed amendments on the appellant within fifteen (15) days.

After the appellant receives the transcript he/she will set a date for settlement. At that time the transcript and the proposed amendments will be submitted to the judge. You need not appear in Court on that day.

Any further proceedings will take place in the Appellate Term of the Supreme Court.

Dated: 2-25-20

Signature: Valmiki Ramani

Appellant

CIV-GP-42-i (Revised 4/04)

Address: 139-05 85th Dr 6D
Briarwood NY 11435

FREE CIVIL COURT FORM

No fee may be charged to fill in this form.

Form can be found at: <http://www.nycourts.gov/courts/nyc/civil/forms.shtml>.

Decision/Order in lieu of Transcript

Valmiki Ramon
 against Plaintiff
 Amazon.com Defendant Index number
 CV-031556-19/QU

In lieu of a Transcript I Valmiki Ramon
 Plaintiff hereby submit the Judge Decision/Order.

- ① The defendant attorney filed a motion to dismiss as the claimed that the defendant was not properly served as per CPLR - To a officer of the defendant / Amazon.com.
- ② In July 2019 I was assaulted by an amazon.com deliver person, filed a summons - complaint as instructed by Amazon.com via email and FAX, as I was informed Amazon.com maintain an office that only deals with such matters, I did as told and Amazon.com had their attorney Davis Wright Tremaine of 1251 6th Ave NY 10020 replied and offered me an out of Court settlement.
- ③ Sixty days later I filed another summons and complaint against Amazon.com.

①

For \$ 25,000 as a result of having existing body damage due to defective product they sold me. Their attorney in order to have the case dismissed claimed that the defendant was not properly served, and the Judge despite empirically by previous service Amazon.com settled the case. However this case is of much more request for compensation, as I have what still exists damage to my skin on abdomen as see in attached exhibit, am I not entitled to compensation?

(4) Justice Evans over looks the empirical history of my legal issue with Amazon and has ruled, which I deem prejudicial, in favour of Tara Reeves, and declares the case dismissed because he agrees with Tara Reeves motion that defendant was not properly served. Sixty days before the defendant acknowledge service and settled claim, but this time the monetary value of the case is more and the damage is greater on Justice Evans does not take all of this into account!

The defendant the largest company in the world must be allowed to get richer on the backs of the average person who patronise them.

This is prejudice, and greed.

A firm the size of Amazon ever changed their FAX number and email address, such a petty thing for a company this size to get out of their responsibility, and Justice Evans is aiding them by dismissing my case.

- (5) Therefore I appeal to the Supreme Court of the State of New York, to see this for what it is, how does a company change the order of process service in 60 days? Justice Evans not using empirical evidence to make a wise decision but is hiding behind the CPLR in favour of Tao Reeves?

Uahmiki Raman

Uahmiki Raman

Supreme Court of the State of New York

Appellate Term: Second Department

Request for Appellate Term Action [RATA] (Pursuant to 22 NYCRR 731.2 [a]) - Civil

Case Title: Set forth the title of the case as it appears on the summons, notice of petition or order to show cause by which the matter was or is to be commenced, or as amended.

VALMIKI RAMANI
-against-

Amazon - Com.

For Court of Original Instance

Date Notice of Appeal Filed

For Appellate Term

Case Type

☐ Small Claims ☐ Landlord & Tenant ☒ Civil ☐ No Fault

Appeal

Paper Appealed from: ☒ Judgment ☐ Order ☐ Decision
(Check all that apply)

Court: CIVIL COURT	County: Queens
Dated: Jan 16 2020	Entered: Queens County
Judge (name in full): LANCE EVANS	Index No.: CV-031556-19/QU
Trial: (Circle One) Yes <input checked="" type="radio"/> No <input type="radio"/>	

Prior Appeals and Related Case Information

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NO

Original Proceeding

Commenced by:

(Check One)

☐ Order to Show Cause ☐ Notice of Petition and Petition ☒ Summons and Complaint ☐ Small Claims Complaint Form ☐ Other: _____

Date: OCT 23 2019

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Decision / Order \$25,000 Compelling
/ motion dismissed Jan 16 2020

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No.	Party Name	Original Status	Appellate Term Status
1	Valmiki Raman	Plaintiff	Appellant

☐ Represented ☒ Pro Se

Attorney/Firm Name: (if applicable) Tau Reeves, Davis - Wright - Traimere

Address: 1251 Ave of the Americas

City: NYC State: NY Zip Code: 10020 Telephone:

E-Mail Address: Fax Number:

No.	Party Name	Original Status	Appellate Term Status
2			Respondent

☐ Represented ☐ Pro Se

Attorney/Firm Name: (if applicable)

Address:

City: State: Zip Code: Telephone:

E-Mail Address: Fax Number:

No.	Party Name	Original Status	Appellate Term Status
3			

☐ Represented ☐ Pro Se

Attorney/Firm Name: (if applicable)

Address:

City: State: Zip Code: Telephone:

E-Mail Address: Fax Number:

Civil Court of the City of New York
County of _____

Part _____

Index Number CV-031556-19/91

VALMIKI RAMANI

Claimant(s)/Plaintiff(s)/Petitioner(s),

NOTICE OF APPEAL

-against-

AMAZON.COM

Defendant(s)/Respondent(s)

PLEASE TAKE NOTICE that the Appellant, VALMIKI RAMANI
hereby appeals to the Appellate Term of the Supreme Court, First/Second Department, from
Strike one

the Order/Judgment by the Hon. LANCE EVANS
Strike one

Judge of the Civil/Housing Court of the City of New York, entered in the office of the Clerk of
Strike one

said Court on Jan 16 2020, and from each and every part thereof.

Dated: 2-25-20

Appellant's Signature: Valmiki Ramani

Appellant's Name: VALMIKI RAMANI

To:

Tara Revere

Address: 139-05 85 DR 6D

Davis Wright Trammell

BRIARWOOD NY 11435

12516 Ave NY 10020

Appellant's Phone: 718-291-2978

Civil Court of the City of New York

County of _____

Index Number _____

WALMIKI RAMANI

Petitioner,

-against-

Amazon.com

Respondent.

NOTICE OF SETTLEMENT
OF TRANSCRIPT

To the Appeals Clerk, Civil Court, City of New York, County of Queens,

and to Amazon.com Respondent.

The above captioned case is to be settled before the Hon. Lance Eans

on 3 - 17 2020

I have attached my list of objections/corrections to this Notice.

2 The respondent has provided a list of objections/corrections, and that list is attached.

_____ The respondent has not provided a list of objections/corrections.

(Initial the appropriate section above)

Dated: 2-25-20

Walmiki Ramani

Signature

139-0585 DR 68
3 Brarwood m/11/35

Address

CIV-GP-42A-i(Revised 4/04)

FREE CIVIL COURT FORM

No fee may be charged to fill in this form.

Form can be found at: <http://www.nycourts.gov/courts/nyc/civil/forms.shtml>.

Civil Court of the City of New York

County of _____

Index Number CV-031556-19/DC

VALMIKI RAMANI

Claimant(s)/Plaintiff(s)/Petitioner(s)
-against-

AMELZON CORP

Defendant(s)/Respondent(s)

**NOTICE OF TRANSMITTAL
OF TRANSCRIPT**

TO: Appeals

The enclosed transcript is being forwarded to you, the appellee, following Section 1704 of the Civil Court Act together with a copy of the proposed amendments.

Within fifteen (15) days of service you shall make any proposed amendments or objections to the transcript and serve them on the appellant.

The amendments or objections are to be made by referring to the page and line number in the transcript and specifying the change. For example, if the transcript says that the time that an incident occurred was 3:30 P.M. when the testimony given at the trial was 2:30 P.M., label a piece of paper Proposed Amendments and Objections, list the page, the line number and the proposed amendment.

You must return a copy of the proposed amendments to the appellant. Be sure to serve the proposed amendments on the appellant within fifteen (15) days.

After the appellant receives the transcript he/she will set a date for settlement. At that time the transcript and the proposed amendments will be submitted to the judge. You need not appear in Court on that day.

Any further proceedings will take place in the Appellate Term of the Supreme Court.

Dated: 2-25-20

Signature: Valmiki Ramani
Appellant

CIV-GP-42-i (Revised 4/04)

Address: 139-05 85th St (D) 6D
BRIARWOOD NY 11435

Decision/Order in lieu of Transcript

Valmiki Ramon
 against Plaintiff
 Amazon.com Defendant Index number
 CV-031556-19/QU

In lieu of a Transcript, Valmiki Ramon
 Plaintiff hereby submit the Judge Decision/Order.

- ① The defendant attorney filed a motion to dismiss as the claimed that the defendant was not properly served as per CPLR - To a officer of the defendant / Amazon.com.
- ② In July 2019 I was assaulted by an Amazon.com delivery person. I filed a summons - complaint as instructed by Amazon.com via email and FAX, as I was informed Amazon.com maintains an office that only deals with such matters, I did as told and Amazon.com had their attorney Davis Wright Tremaine of 1251 6th Ave NY 10020 replied and offered me an out of court settlement.
- ③ Sixty days later I filed another summons and complaint against Amazon.com.

①

For \$ 25,000 as a result of having existing body damage due to defective product they sold me. Their attorney in order to have the case dismissed claimed that the defendant was not properly served, and the Judge despite empirically by previous service Amazon.com settled the case. However this case is of much more request for compensation, as I have what still exists damage to my skin on a backman as see in attached exhibit, am I not entitled to compensation?

- (4) Justice Evans over looks the empirical history of my legal issue with Amazon and has ruled, which I deem prejudicial, in favour of Tara Reeves, and declares the case dismissed because he agrees with Tara Reeves motion that defendant was not properly served. Sixty days before the defendant acknowledge service and settled claim, but this time the monetary value of the case is more and the damage is greater on Justice Evans does not take all of this into account!

The defendant the largest company in the world must be allowed to get richer on the backs of the average person who patronise them. This is prejudice, and greed. A firm the size of Amazon ever changed their FAX number and email address, such a petty thing for a company this size. To get out of their responsibility, and Justice Evans is aiding them by dismissing my case.

- (5) Therefore I appeal to the Supreme Court of the State of New York, to see this for what it is, how does a company change the order of process service in today's? Justice Evans not using empirical evidence to make a wise decision but is hiding behind the CPLR in favour of Tao Reeves?

Valmiki Ramani

Valmiki Ramani

Civil Court of the City of New York
County of Queens
Part 101

Index Number CV-031556-19/QU
Motion Cal # 1 Motion Seq. #
Papers Submitted to Special Term
on November 15, 2019

VALMIKI RAMANI,

Plaintiff(s),

against

AMAZON.COM,

Defendant(s)

DECISION/ORDER

Civil Court
of the
City of New York

JAN 16 2020

ENTERED
QUEENS COUNTY

Recitation, as required by CPLR §2219(a), of the papers considered in the review of this motion by the Patricia Rivers for an order granting stay the sale, destruction or disposition of the vehicle, the retention of which by a garage keeper is the subject of the proceeding.

Notice of Motion - Affidavits - Exhibits - Service
Notice of Motion Affirmations- Exhibits - Service

Papers
Numbered
1
2

The plaintiff *pro se* herein brings a motion seeking approval of his attempt to serve the summons and complaint in the underlying action. The Defendant moves to dismiss the complaint pursuant to CPLR 3211(a)(1), 3211(a)(7), 3211(a)(8), and/or 3211(a). The movant's affidavit in support states that he was instructed (without providing the identification of the person) that service of his papers should be done by email and fax; that they do not accept personal service. The movant alleges that he followed the instruction and his papers were accepted by the same "firm" that represents the defendants in this law suit. The movant emphasizes that the defendants' present counsel are the same as the firm represented them in a law suit circa July 30, 2019. The movant asserts that the law firm's insistence that the service was defective is because this law suit's "demand for compensation damages is larger in this case". The movant revisited the series of steps undertaken in the July 30, 2019 law suit, which includes, inter alia, that he filed "a copy of service on July 30, 2019 with Rm. 147". Eventually, an out of court settlement was accomplished in that matter. The movant emphasizes that a comparison of the affidavit(s) of service in the July law suit with the affidavit of service dated September 26, 2019 in the instant

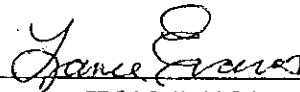
suit demonstrated that there is a dissimilarity. The affidavit of service under index no. CV-026077/19 dated 7/29/19 states that the summons with endorsed complaint was delivered to (206) 266-7010 subpoena-civil@ Amazon.com. Whereas, under index no. CV-031556/19, the affidavit of service states the summons with endorsed complaint was delivered via email to subpoena-civil @ Amazon.com. In either case, service does not comport with the CPLR.

In opposition to the motion, defendants argue the workings of CPLR 3211, specifically, inter alia, CPLR 3211(a)(8) in concert with CPLR 311(a)(1) which require personal service to be performed by personal delivery to a corporate officer or relative designate. In Defendant's memorandum of law, there is a focus paid upon the Plaintiff's prior action through his process server's delivery of that complaint via fax and email. Yet, the Defendant did settle that action with the Plaintiff. However, now Defendant takes umbrage by remonstrating that the Plaintiff's present service was defective when seemingly the only difference is that Plaintiff did not fax the summons and complaint. Nonetheless, the Court finds that the reasoning which allowed a settlement to occur with a similar type of service of process should not vitiate the statute, CPLR 311 (a)(1) and condone as well as elevate, the service herein to prosecute the instant complaint. In either case, service was deficient.

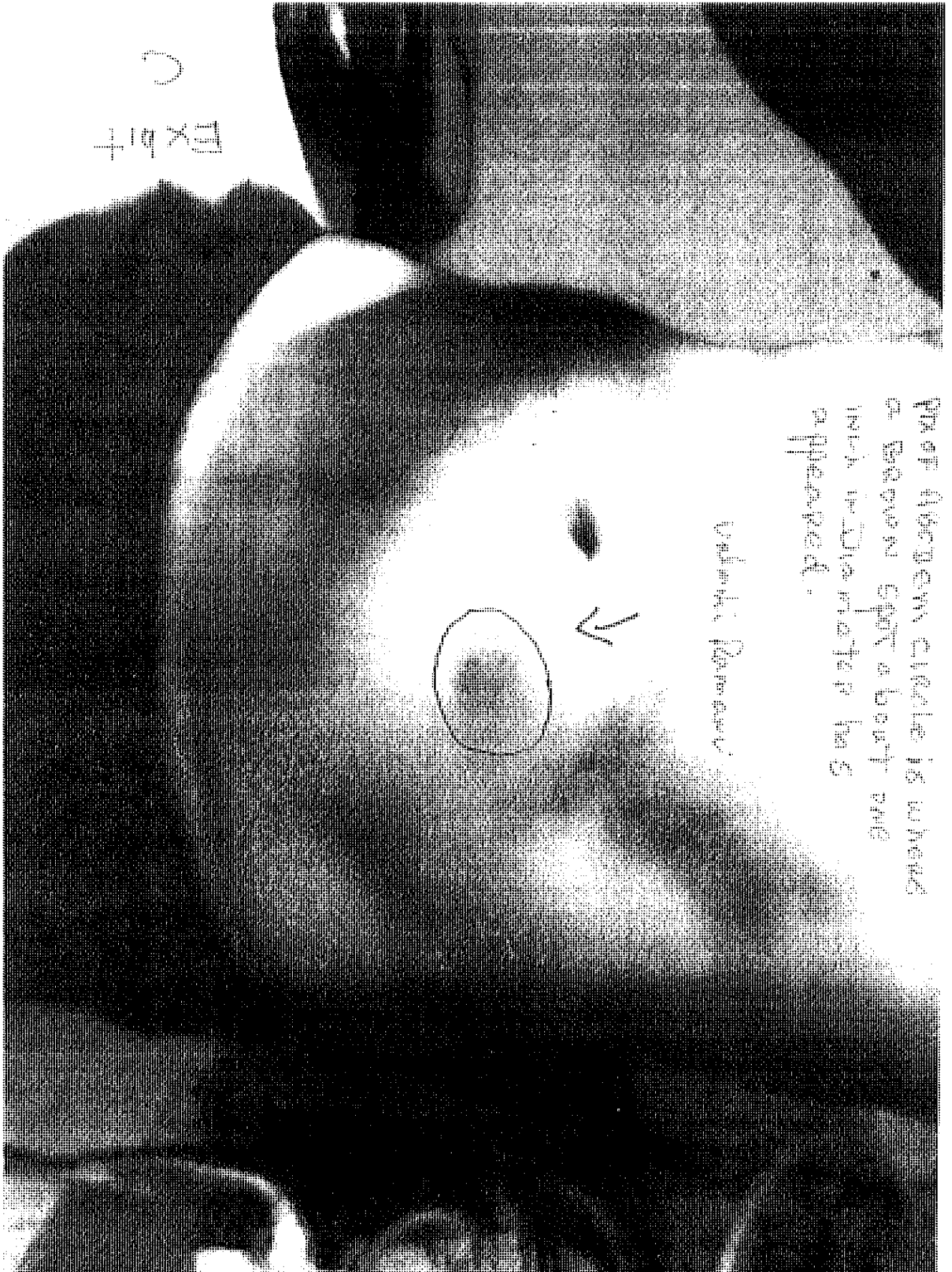
Accordingly, the Court finds that the Plaintiff failed to demonstrate compliance with CPLR 311(a)(1) and establish personal jurisdiction of the Court. The other arguments of the Defendant are not reached for consideration. As such, the complaint is dismissed.

The foregoing constitutes the decision and order of the Court.

Date: 12/17/19



HON. LANCE EVANS
Judge, Civil Court



Part of the person's face is shown
a brown spot a burst one
with in the matter has
appeared.

Vulcan

Exhibit

INSTRUCTIONS FOR SERVICE

A party to the action cannot serve the Notice of Appeal. It must be served by some other person, 18 years of age or older. [CPLR 2103 (A)]

In the event the other party is represented by an attorney, you are required to have the Notice of Appeal served upon the attorney. After service has been made, the Affidavit of Service by Mail (item "A" below) must be completed by the person who served the papers and sworn to before a Notary Public.

In the event the other party is not represented by an attorney, you are required to have the Notice of Appeal served on the other side. After service has been completed, the Affidavit of Service by Mail (item "B" below) must be completed by the person who served the papers and sworn to before a Notary Public.

AFFIDAVIT OF SERVICE BY MAIL UPON THE PARTY'S ATTORNEY OR UPON A PARTY

State of new York) ss.:
County of Queens)

The undersigned being duly sworn, deposes and says:
He or she is not a party to the action, is over 18 years of age and resides at:

- () A. That on 2-25, 2020 deponent served the within Notice of Appeal on Tia Beaver, Attorney(s) for Amarion Corp in this action at Davis Wright T Romain 125 L B Ave 21st Fl NYC 10020 the address designated by said attorney(s) for that purpose
- () B. That on 2/25, 2020 deponent served the within Notice of Appeal upon the other party _____ in this action at _____ the address designated by said other party for that purpose by depositing a true copy of same enclosed in a postpaid properly addressed wrapper, in a post office depository under the exclusive care and custody of the United States Postal Service within the State of New York.

Sworn to before me
this 25 day of February 2020

NOTARY PUBLIC

ZLATA AKILOVA
Notary Public, State of New York
Reg. No. 01AK6355611
Qualified in Queens County
Commission Expires 03/13/2021

Suleyman
Signature

Milana Suleymanova
Print Name

INDEX NO: _____

AFFIDAVIT OF SERVICE
OF
NOTICE OF TRANSMITTAL
OF TRANSCRIPT

CIVIL COURT OF THE CITY OF NEW YORK
COUNTY OF QUEENS

V Almiri Roman Plaintiff(s)

-Against-

Amazon . Com Defendant(s)

State of New York)
County of Queens ss.:

Milana Suleymanova, being duly sworn, deposes and says:

I am over 18 years of age and not a party to this action.

At 1:03 A.M. / P.M. on 25 Feb / 2020 139-09 84 Drive 1A
(Time) (Date) (Address)
Babylon, NY 11435 in the County of Queens

City of New York, I served the Notice of Transmittal of Transcript in this matter on:

100 Reaves-Davis Wright Terrace 1251642 Ave ny 10020
() A. Known to me to be the other party Defendant in this action at
1251642 Ave ny 10020 21 FF, the address designated
by said other party for that purpose.

() B. Known to me to be the Attorney(s) for Amazon . Com
in this action at 1251642 Ave ny 10020 21 FF
the address designated by said attorney(s) for that purpose by depositing a true copy of
same enclosed in a postpaid properly addressed wrapper, in a post office depository under
the exclusive care and custody of the United States Postal Service within the State of
New York.

Sworn to before me
this 25 day of February, 2020

Notary Public

ZLATA AKILOVA
Notary Public, State of New York
Reg. No. 01AK6355611
Qualified in Queens County
Commission Expires 03/13/2021

Suley
Signature
Milana Suleymanova
Print name here

CIVIL COURT OF THE CITY OF NEW YORK
COUNTY OF Queens : PART 34.

Index No.: CV-031556-19/94

Valmir R. Roman Petitioner,

**AFFIDAVIT OF SERVICE
BY MAIL**

-against-

Amazon.com

Respondent.

STATE OF NEW YORK
COUNTY OF Queens

Roman Abraham being duly sworn,
deposes and says:

I am over 18 years of age and not a party to this action. On October 23, 2019

I served Taa M. Reaves

upon SWORN/Mail 2019, the MOTION in this

proceeding, by mailing a true copy of the attached papers, enclosed and properly sealed in a
postpaid envelope, which I deposited in an official depository under the exclusive care and
custody of the United States Postal Services within the State of New York addressed to

1251 Avenue of the Americas the ATTORNEY
New York, NY 10020
at:

Signature: RABraham

Sworn to before me this 23 day of October 20 19

[Signature]
Notary Public or Court Employee

ZLATA AKILOVA
Notary Public, State of New York
Reg. No. 01AK6355611
Qualified in Queens County
Commission Expires 03/13/2021

CIVIL COURT OF THE CITY OF NEW YORK
COUNTY OF Queens : PART 34

Valmiki Ramani

Plaintiff,

NOTICE OF MOTION

-against-

Index No.

Amazon Comm

CV-031556-19/QU

Defendant.

PLEASE TAKE NOTICE that upon the annexed affidavit of Valmiki Ramani
sworn to on the 23 day of OCT 2019, and the exhibits annexed thereto, and
upon all the prior pleadings and proceedings had herein, the PLAINTIFF/DEFENDANT will
move this Court located at 89-17 51st Ave Bldg Jamaica NY 11435
New York, Part 34, Room 307, on the 14 day of 11
2019, at 9.30 o'clock, or as soon thereafter as can be heard for an Order:

As per attached motion

PAPERS RECEIVED
SPECIAL TERM /

OCT 23 2019

CIVIL COURT-QUEENS

and for such other and further relief as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that (check the applicable box below):

these papers have been served on you at least eight days before the motion is scheduled to be heard. You must serve your answering papers, if any, at least two days before such time. At least three days prior to the time at which the motion is noticed to be heard you may serve upon the moving party a notice of cross-motion demanding relief.

these papers have been served on you at least sixteen days before the motion is scheduled to be heard. You must serve your answering papers and any notice of cross-motion with supporting papers, if any, at least seven days before such time. Reply or responding affidavits shall be served at least one day before such time.

Dated: OCT 23 2019

From: Valmiki Ramani
718-291-2978

Email: VALMIKI.D.R
@gmail.com

CIV-GP-124-i

FREE CIVIL COURT FORM

No fee may be charged to fill in this form.

Form can be found at: <http://www.nycourts.gov/courts/nyc/civil/forms.shtml>.

CIVIL COURT OF THE CITY OF NEW YORK
COUNTY OF _____: PART

UVALMIKE Ramani

Plaintiff,

AFFIDAVIT IN SUPPORT

-against-

Index No. CV - 031556-19/pu

Amazon .Com

Defendant.

STATE OF NEW YORK
COUNTY OF Queens ss.:

I Uvalmike Ramani - Plaintiff being duly sworn, hereby deposes and says:

That this motion is to affirm the fact that in July I made a Law Suit against defendant and was told how to service the papers via email and fax as they do not accept personal service, this was done and was accepted by the firm DW, the same firm that represents the defendant in this suit. They are claiming that the present papers were not served properly whereas it was served the same way as the first Law Suit in July 30 2019. Nor could Amazon .Com change their servicing process *modus operandi* no, two months after July 30 2019, this is only defendant's attorney's objection because the demand for compensation and damages is larger in this case.

they expect not to compensate me for the damage to my physical body done by a defective product they sold me, no they have to take responsibility for this and own up to selling a defective product that cause serious physical damage to my person.

WHEREFORE, THE UNDERSIGNED RESPECTFULLY REQUESTS THE WITHIN MOTION BE GRANTED.

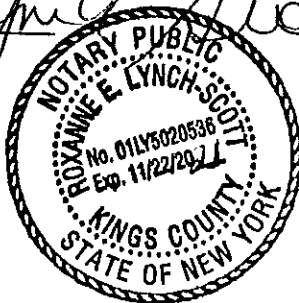
Valmiki Romani
Valmiki Romani

Signature

Valmiki Romani

Sworn to before me this 23rd day of October 2019

Roxanne E. Lynch-Scott
Notary Public/Court Employee



CIV-GP-121-i

FREE CIVIL COURT FORM

No fee may be charged to fill in this form.

Form can be found at: <http://www.nycourts.gov/courts/nyc/civil/forms.shtml>

West County of New York

County of Queens
Valmiki Ramani
Plaintiff

INDEX NO: CV-031556-19/qu

Amazon, Com
Defendants

MOTION

- 1) I Valmiki Ramani, plaintiff makes this motion on direction of Justice Katsaros on 10-22-19, where as the defendant's motion that proper service of Summons and Complaint was not made on this case.
- 2) During the month of July 2019, plaintiff filed a lawsuit in Civil Court against defendant in case Index no 026072-19/qu after being assaulted by defendant's delivery person. The defendant told the plaintiff on inquiry that they do not receive personal process service and they maintain an office separately to do receiving of civil legal papers, and the paper should be Fax ed to 206-266-7010 and email to Subpoena-Civil 2 Amazon -Com. Both methods were recommended. The plaintiff did so and filed a copy of service on July 30, 2019 with Ann 147, a copy here with attached.

(1)

3) The defendant responded by having Mr G Brounell attorney at law filed a response to FD Summons and Complaint, an out of Court settlement was made ⁸⁻²⁶⁻²⁰¹⁹ July 23 2019 Copies of Stipulation of Settlement and Stipulation of Discontinuance with Prejudice. Why did the defendant replied and made a settlement if service was not done properly by FAX and Email on July 30 2019? This verify that this method of service is the valid way to process service. The defendant

4) There goal for the defendant attorney Taryn Reeves of the firm Davis Wright Tremaine LLP to claim that the process of service in Case Index CV-021556-19/CV was made in proper as it was done in the same way as the first lawsuit on July 30 2019 in Index CV-026077-19/Qu; is highly irrational and it is nothing but a claiming at a straw to get out

of a much larger lawsuit which has a lot of merit as shown in plaintiff papers, which includes photos of damage done by the leaking of gas from product sold by Amazon.com, by testimony in writing by two physicians the plaintiff general physician and his dermatologist who is a practicing physician at Columbia Doctors, and a teaching staff at Columbia University. This claim is weak and professionally irresponsible and Ms Reaver and the firm they represent should be ashamed of themselves in employing such a deceiving defense.

5) I hereby ask the court to retain service dated 29 day of 9, 2019 as being valid and that relief sought by the plaintiff be granted.

Copy to defendant's
attorney

Valmiki Ramani
Plaintiff

Taej M Reaves

VALmiki Ramani

Davis Wright Tremaine LLP

718-291-2978

125 Avenue of Americas

VALmiki.D.Ra

NY: NY 10020

Gmail - Com

Email: TaejReaves@

DWT-Com

EXHIBITS

Civil Court of the City of New YorkCounty of Queens

Part

Index Number

CV-031556-19/QV

Motion Cal. #

Motion Seq. #

DECISION/ORDER

Recitation, as required by CPLR §2219 (a), of the papers considered in the review of this Motion:

Claimant(s)/Plaintiff(s)/Petitioner(s)

against

Amazon.com

Defendant(s)/Respondent(s)

Papers**Numbered**

Notice of Motion and Affidavits Annexed.....

Order to Show Cause and Affidavits Annexed.....

Answering Affidavits

Replying Affidavits.....

Exhibits

Other.....

Upon the foregoing cited papers, the Decision/Order on this Motion to

DefendantsDirect Plaintiffto file a formal pleading

is as follows:

1) denied

2) Endorsed complaint is sufficient pursuant to the standard discussed in Holloway v New York City Transit Authority, 69d NYS2d 261 (1st Cir Ct NY County 1994).3) Plaintiff may submit a motion to dismiss based on Phone Service.Civil Court
of the
City of New York

OCT 22 2019

ENTERED
SO ORDERED
QUEENS COUNTY

OCT 22 2019

10/22/19

Date

Judge, Civil Court

John C.V. Katsanos
Hon. John C.V. Katsanos

CIVIL COURT OF THE CITY OF NEW YORK
COUNTY OF QUEENS

VALMIKI RAMANI

Plaintiff,

- against -

AMAZON.COM,

Defendant

STIPULATION OF SETTLEMENT

Index No. CV-026077-19,QL

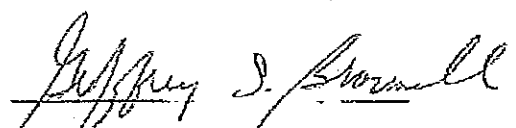
It is hereby stipulated and agreed by and between the parties that the above-referenced action is settled as follows:

Defendant Amazon.com ("Amazon") shall pay Plaintiff Valmiki Ramani ("Plaintiff") two-thousand dollars (\$2,000.00). In exchange, Plaintiff agrees to discontinue this lawsuit with prejudice and relieve, release and forever discharge Amazon and each of its affiliates, subsidiaries, attorneys, agents, officers, directors, shareholders, members, and employees (collectively "Representatives") of and from any and all losses, liabilities, demands, costs, expenses, damages, claims, suits, actions and causes of action of whatever kind or nature against Amazon and its Representatives arising from or relating to this litigation.

This Stipulation may be signed in counterparts and facsimile signatures are valid and binding.


Plaintiff Valmiki Ramani

Date: 2/23/20


Geoffrey J. Brounell, counsel for Defendant
Amazon.com

Dated: 2/26/20

CIVIL COURT OF THE CITY OF NEW YORK
COUNTY OF QUEENS

VALMIKI RAMANI,

Plaintiff,

- against -

AMAZON.COM,

Defendant.

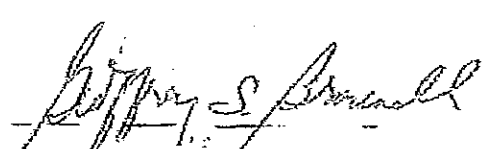
STIPULATION OF
DISCONTINUANCE WITH
PREJUDICE

Index No. CV-026077-19/QL

IT IS HEREBY STIPULATED AND AGREED by the undersigned that whereas no party hereto is an infant or an incompetent person for whom a committee or conservatee has been appointed, and no person not a party has an interest in the subject matter of the action, the above-captioned action, and all claims and counterclaims asserted herein, are discontinued with prejudice and without costs to either party as against the other.

This Stipulation may be signed in counterparts and facsimile signatures are valid and binding.


Plaintiff Valmiki Ramani


Jeffrey S. Brumell, counsel for Defendant
Amazon.com

Dated: 2/26/2019

Civil Court of the City of New York
County of Queens

VALMIKI RAMANI

Plaintiff(s)

-against-

AMAZON.COM

Defendant(s)

Index no: CV-026077-19/QU

Affidavit of Service of Summons
with Endorsed Complaint
(Personal and Corporate)

State of New York, County of Queens ss:

Zlata Akiylova

(Name of Server)

, being duly sworn, deposes and says:

I am over 18 years of age and not a party to this action.

At _____, AM/PM, on 07/29/19 at 139-09 84th Dr, Briarwood, NY 11435
(Time) (Date) (Address)

in the County of Queens, City/State of New York, I served the attached
(Name of County)

SUMMONS WITH ENDORSED COMPLAINT in this matter on Amazon.com
(Name of Defendant as Shown Above)

by delivering the said SUMMONS to:

(206) 266-7010 subpoena - civil@amazon.com who is:
(Name of actual person with whom the SUMMONS was left)

☐ The said defendant in person,
or,

☐ known to me to be the _____ of the Amazon Civil Process
(Title) (Corporation/Partnership)

Description of Individual Served in Person:

Sex: _____

Color of Skin: _____

Color of Hair: _____

Approximate Age: _____

Approximate Weight: _____

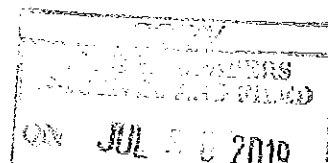
Approximate Height: _____

sworn to before me this 29 day of 07, 20 19

Sieun Akiylova
(Notary Public)

(Signature of Deponent)

AKILOV SION
Notary Public, State of New York
Reg. No. 01AK6045819
Qualified in Queens County
Commission Expires July 31, 2022



SEP 27 2019

Civil Court of the City of New York
County of Queens

Index no: CV-031556-19/QU

VALMIKI RAMANI
Plaintiff(s)

-against-
AMAZON.COM
Defendant(s)

Affidavit of Service of Summons
with Endorsed Complaint
(Personal and Corporate)

State of New York, County of Queens ss:

Zlata Akilova

(Name of Server)

, being duly sworn, deposes and says:

I am over 18 years of age and not a party to this action.

At 1:23 AM/PM on 9/26/19 at 139-09 84th St 1A
(Time) (Date) (Address) BRIARWOOD NY 11435

in the County of Queens, City/State of New York, I served the attached
(Name of County)

SUMMONS WITH ENDORSED COMPLAINT in this matter on Amazon . Com
(Name of Defendant as Shown Above)

by delivering the said SUMMONS to:

Via Email Subrena - CIVIL @ Amazon . Com who is:
(Name of actual person with whom the SUMMONS was left)

☐ The said defendant in person,

or,

☐ known to me to be the VIA EMAIL of the Amazon . Com
(Title) (Corporation/Partnership)

Description of Individual Served in Person:

Sex: _____ Color of Skin: _____ Color of Hair: _____
Approximate Age: _____ Approximate Weight: _____ Approximate Height: _____

Sworn to before me this 26 day of 9, 20 19

(Signature of Deponent)

(Notary Public)

AKILOV SION
Notary Public, State of New York
Reg. No. 01AK6045819
Qualified in Queens County
Commission Expires July 31, 2022

CIVIL COURT of City of New York

County of Queens
Valmiki Ramani
Plaintiff
Amazon.com
Defendant

INDEX NO
CV-031556-1P/QU
MOTION Reply

- To the defense attorney and DWT LLP,
your content in your motion is
pathetic, to dig into my legal history
and bring to the court's attention that
I have had six lawsuits, but principally
mention that I sued President B. Obama
without stating the facts as the New
York Post wrote it. Obama a sleaze,
and google this and thrusting this
in the fore front of your motion is
disgusting, Let me enlighten you!!
- 2) 2010 In the Gulf of Mexico BP US had
an oil spill and could not stop or
contain it, it was on all times on TV
showing the oil coming out the broken
well, and crude oil polluting the
entire region the US Government could
not stop it, and BP US could not,
the company's chairman left and went
sailing on the Thames River while

(1)

the American Homeland suffered. Obama's
 Government made a nation al appeal
 for any one who had any idea
 to put a stop to the well etc, to
 come forward. I previously worked
 as a Officer Cadet on a Canadian Merchant
 ship who ran one end crude oil bet ween
 South America and Trinidad W.I. - I saw
 crude oil and the damage it was doing to
 the beautiful bay and thought up of
 a way to clean it up, you cant just
 put a match to it and it will burn
 it's crud unprocessed oil, I decided
 that it had to be made co bus ti ble by infusing
 it with an agent - Kerosene, diesel etc
 then setting it a flame. I also de vis ed
 a method to cap the well, I made diagrams
 of this and along with an IMPLIED
 CONTRACT, embodied in a Letter
 I sent it to Obama, Two weeks later
 Oval office speech he announced they
 had began to burn the oil, did you

brilliant people wonder how it was you stopped seeing T.V. fix of the gushing oil? I then wrote Obama requesting 1.5 million for my efforts, he refused to pay me despite BP US was going to pay the US government Billions in compensation, so I sued him even in federal court when Chief Justice C. Mac Mohan revealed he had immunity. Look at the google article and see what and how the New York Post describes him, so you big shot lawyers, I sue when I have a valid right to! So let this Civil Court Judge on Stephen Blvd buy into it I Sue!!!

- (3) July an Amazon delivery person kept pressing my doorbell, asked why he kept doing it, he said I am an Amazon delivery man, I asked him you are a delivery for me, he said

No, then I said to him why the hell they
 you are running my door he, I was
 sedated and resting, he then slammed
 the heavy box into my right shoulder
 and kneed me in the right leg to get
 past me - the door, into the lobby, after
 dumping the box he accosted me and with
 fury said he would "kick my ass" - verbation
 I filed a Law suit against Amazon, after
 their office told me they do not accept
 PERSONAL Service, it had to
 be FAXed - or E mail or both -
 I did so and DWG replied and an out
 of court settlement of \$2,000 was made.

4) Two months later a gel pack I purchased
 from the defendants leaked onto my
 body - skin irritably causing contact
 dermatitis, I filed suit, then between
 the week I was to return to my doctor's office
 for a follow up, large (3) brown skin
 large patches appeared, I ammerated the Suit.

Now in this Law Suit for the damage to my person Amazon defense is claiming,

(A) We sell it damage the user, but we are not responsible, despite in the add it says "IN STOCK", which means it's a product Amazon buys from a manufacture and sells, and this being so there is no contract between me, the buyer, and Amazon the seller, that I should seek out the manufacture and sue the also. It's not so, this contract of sale was between myself and Amazon who carried the product in stock, it was not shipped from a third party.

(2) Service - Two months before the gel spill, I successfully sued Amazon using as to let to email Subpoena-Civil Amazon.com, it worked DWT Replied - their legal people then TWO months after the gel spill, I Faxed not Emailed

(5)

the second law suit the same way as the first, and DWT responded and they are saying Amazon was not properly served, why then did they replied if the email address Sadpeone. Civil @ Amazon-Com was not valid? No they have changed their process service fax number and from Email to regular mail, to get out of this Law suit, it's not going to fly !!!

6) Why does Amazon do not think they owe me compensation for the damage to my body the product did to my body, is it because they are endowed to keep all monies and keep making monies even if their customer suffers injury. Well it's not going to happen Amazon is not getting out of this, and I will no reply to all the other legal jargon

(6)

Contained in this motion, because the Judge in this case in the Civil Court will have to see the facts and award me compensation. If not, this will go to a higher court, Amazon is worth \$140 Billion dollars and they are running greedily from a case of this size!

Taaj M Reeves
DWT LLP
1251 6th Ave
NY NY

VALmiki Ramant
PLAINTIFF
Valmiki Ramant

EXHIBIT

\$1.5M FOR YOUR THOUGHTS?

Obama's one slick operator.

A Queens man claims he wanted to help out President Obama after the 2010 oil spill in the Gulf of Mexico, so he wrote a letter suggesting the greasy stuff be burned away.

"Should my suggestion be used I would like compensation!" Valmiki Ramani wrote.

A couple of weeks later, the president announced that controlled burns were being used to help stanch the spill, but Ramani says he was treated crudely — he never got the \$1.5 million he requested in return for his lightbulb moment. "To date I received no payment," he wrote in a Manhattan federal lawsuit.

They may gain the streets
and it'll be like house too!

Article in my post

Civil Court of the City of New York
County of Queens

Index Number: **CV-026077-19/QU**

VALMIKI RAMANI

Plaintiff(s)

-against-

AMAZON.COM

Defendant(s)

**SUMMONS WITH ENDORSED
COMPLAINT**

BASIS OF VENUE: Plaintiff's residence

Plaintiff's Address (s) :

VALMIKI RAMANI

139-05 85TH DR

APT 6D

BRIARWOOD, NY 11435

To the named defendant (s)

AMAZON.COM (Deft), at 410 TERRY AVE NORTH, Seattle, WA 98109

YOU ARE HEREBY SUMMONED to appear in the Civil Court of the City of New York, County of Queens at the office of the Clerk of the said Court at **89-17 Sutphin Boulevard** in the County of **Queens, City and State of New York**, within the time provided by law as noted below and to file your answer to the (endorsed summons) (annexed complaint) * with the Clerk; upon your failure to answer, judgment will be taken against you for the total sum of \$5,000.00 and interest as detailed below. Plaintiff's work sheet may be attached for additional information if deemed necessary by the clerk.

Date: July 29, 2019

Alia Razzaq

Chief Clerk

ENDORSED COMPLAINT

The nature and the substance of the plaintiff's cause of action is as follows: **Assault, harassment, personal injuries, pain & suffering caused by delivery person for \$5,000.00 with interest from 07/23/2019**

***NOTE TO THE DEFENDANT**

A) If the summons is served by its delivery to you personally within the City of New York, you must appear and answer within **TWENTY** days after such service; or

B) If the summons is served by delivery to any person other than you personally, or is served outside the City of New York, or by publication, or by any means other than personal delivery to you within the City of New York, you are allowed **THIRTY** days after the proof of service thereof is filed with the Clerk of this Court within which to appear and answer.

C) Following CPLR 321(a) corporations must be represented by an attorney.

*** NOTE TO THE SERVER OF THE SUMMONS**

The person who serves the summons should complete the Affidavit of Service and shall file it in the Clerk's Office in the county where the action is brought.

PLAINTIFF'S CERTIFICATION

(See 22NYCRR, Section 130-1.1a)

SIGN NAME:

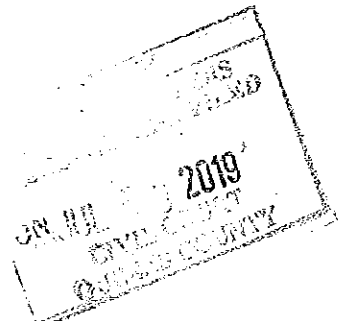
PRINT NAME:

Valmiki Ramani

VALMIKI RAMANI

Exhibit of PRIOR case and
proof of service to
amazon on service to
designated Email

Subpoena - CIVIL Amazon.com
no personal service is accepted by company



VALMIKI RAMANI INDEX NO.
Plaintiff CV-031556-19/QU
against

Amazon.com Defendant Response to Defense
MOTION

I Valmiki Ramani of 139-05 88 DR, 6D
BRIARWOOD NY 11435 hereby deposes the following
to be true, 10-8-19.

D I am appalled that the defense attorney
who I met along with Geoffrey Brannell in
a previous case against Amazon.com where
I was assaulted and injured, and sued
Amazon.com in which a settlement
was reached out of court all of which is
in "exhibit", would claim that Amazon
com was not at present served, when
service of process was done by the same
means as Amazon does not accept personal
service, and only through FAX and Email
which they were served by the accounting firm
on 9-17-19 and 9-26-19 all of which is in
Exhibit. Amazon's Email is sent to a
department specially set up to deal with process
service just look at the email: Subpoena-Civil
Amazon.com.

(1)

2) On August 21, 2019 I purchased for pain in my hip an Amazon item the purchase and carry in stock (as noted on web site) an extra large cool pack 12x21 inches it came in a plastic bag like the one used in produce like of stores, and without the protective cloth cover, so I used an expensive cotton tee shirt, it came via USPS folded up it fitted into my mail box. I used it the first and second time without a problem, the third usage, the gel leaked out and covered my abdomen went down my hip to my back to my hand and to the towel I was laying on after cleaning it off my skin was pink to red, I called my primary care physician (whom you should call as he took pictures of the three large brown/dark skin damage I have); however before they showed up, I had filed a civil suit for the sum of \$5,000 for the, as my doctor described it Contact dermatitis.

3) After seeing my doctor Large dark brown skin started to appear where the gel had come into contact, I was set to re visit as a followup with my physician the next week wens day, I showed him the developemnts and he took pictures with his phone and wrote me a second evaluation, I then went to the civil court and filed for an ammended summons and complaint asking the court to award me the maximum it could of \$25,000 for the injury (ias) I sustained because of the defective Ice pack. This was emailed to Amazon.com by the account firm, and a copy was sent to Geoffrey Brounell of DWT Amazon.com legal agent in New York.

4) I am submitting herewith both Summons - Complaint with proof of service and exhibit to support all the preceeding written herewith.

(3)

including documents (all) on the first case against Amazon.com which was settled out of court, and was processed on Amazon as the current case has been served.

5) This Attorney so disgustingly claims that Amazon.com has not been properly, when they were as in the first case, and has been served on their legal agent here in New York the law firm of DWT!

6) Is Amazon.com, think that they are not responsible for their product injury I sustained; and I will be seeking help in determining if any toxic chemical are in my body as I am able in the future.

Sworn to by:

Date: 10.06.2019

AKILOV SION
Notary Public, State of New York
Reg. No. 01AK6045819
Qualified in Queens County
Commission Expires July 31, 2022

Valmiki Raman

Plaintiff

VALMIKI Raman

(4)

Civil Court of the City of New York

Index Number: CV-031556-19/QU

County of Queens

VALMIKI RAMANI
 Plaintiff(s)
 -against-
 AMAZON.COM
 Defendant(s)

SUMMONS WITH ENDORSED COMPLAINT

BASIS OF VENUE: Plaintiff's residence

Plaintiff's Address (s) :
 VALMIKI RAMANI
 139-05 85 DR
 APT 6D
 BRIARWOOD, NY 11435

To the named defendant (s)

AMAZON.COM (Deft), at 410 TERRY AVE N, Seattle, WA 98109

YOU ARE HEREBY SUMMONED to appear in the Civil Court of the City of New York, County of Queens at the office of the Clerk of the said Court at **89-17 Sutphin Boulevard** in the County of **Queens, City and State of New York**, within the time provided by law as noted below and to file your answer to the (endorsed summons) (annexed complaint) * with the Clerk; upon your failure to answer, judgment will be taken against you for the total sum of \$5,000.00 and interest as detailed below. Plaintiff's work sheet may be attached for additional information if deemed necessary by the clerk.

Date: September 17, 2019

Alia Razzaq
 Chief Clerk

ENDORSED COMPLAINT

The nature and the substance of the plaintiff's cause of action is as follows: **Personal Injuries; Other: Defective product for \$5,000.00 with interest from 09/06/2019**

****NOTE TO THE DEFENDANT***

A) If the summons is served by its delivery to you personally within the City of New York, you must appear and answer within TWENTY days after such service; or

B) If the summons is served by delivery to any person other than you personally, or is served outside the City of New York, or by publication, or by any means other than personal delivery to you within the City of New York, you are allowed THIRTY days after the proof of service thereof is filed with the Clerk of this Court within which to appear and answer.

C) Following CPLR 321(a) corporations must be represented by an attorney.

**** NOTE TO THE SERVER OF THE SUMMONS***

The person who serves the summons should complete the Affidavit of Service and shall file it in the Clerk's Office in the county where the action is brought.

PLAINTIFF'S CERTIFICATION
 (See 22NYCRR, Section 130-1.1a)

SIGN NAME:

PRINT NAME:

VALMIKI RAMANI

Initial Summons and Complaint !

The Civil Court of New York
County of Queens:

VALMIKI RAMANI

PLAINTIFF

against

INDEX NO: CV-031536-19/PU

Amazon.com
Defendant

COMPLAINT

①

To the Civil Court of New York State, County of Queens,
I, Valmiki Ramani, plaintiff of 139-05 85 DR
APT 6D, Briarwood ny 11435, here by deposes
the following to be true against online vendor
Amazon.com INC of 410 TERRY AVE W
Seattle WA 98109, that during the month
of September 2019 I ordered and received one
12 x 21 inches ICE WRAP Icing Compress at a
cost of \$23.99, as shown in exhibit A attached.

②

I placed it in the Fridge's Freezer so it
can become cold and then began to
use it placed in a pink cotton tee shirt to
avoid Frost bite, in use part was around my
left hip and the remainder on my abdomen.
The first and second times I used it were
successful, however the third time I used
it was different, I was laying on a towel
on the bed with Ice pack (extra Large)
strapped on me, my hand was on my side,

(D)

left, when I felt a cold liquid on it, I immediately got up took the ice pack off my body, only to find there was a clear liquid gel on my abdomen and running down my left hip onto the towel. I immediately took paper towel and wiped the gel off my body, and took the ice pack and placed it in a plastic bag after looking to see where the gel came out from. It appears there were at least three 1.5 cm circle which looked like caps, it was from there the gel was leaking out. I then noticed that the area that the gel was on my skin had taken on a pink to red colour. I then proceeded to take a shower to wash the gel from my body fearing it was toxic.

- (3) I then took a steroid cream I was prescribed by my doctor for other skin problems and mixed it with Eucerin lotion to form a compound and rubbed my pink to red skin, I then took Sarin wrap and wrapped my abdomen and around my body with it so I could put on clothes.

- 4) I then made a call to my primary care physician, and told him what had happened and how I handled it. He approved and told me to immediately report to him any changes over several days of treatment. My abdomen showed some improvement, however afraid of being exposed by toxins, I went in on 9-16-19 to my physician to show him my abdomen.
- 5) I have sustained injury to my skin on my abdomen, and do not know if any toxins have entered my body through the leakage of the ice wrap content onto my body, for this I am being observed by my physician.
- 6) Amazon.com has been ~~defiant~~ for selling poor quality and defective product to be used on human skin-body, I was told to return it to them which I did by return UPS Label number 1Z6451Y19038957572, it was received.
- 7) For injury suffered by Amazon.com defective product, I am seeking monetary compensation of \$5,000.00.

from the seller of Ice wrap extra large
icing compress 12x21 inches sold
at the price of \$23.99.

Valmiki Ramani
Plaintiff

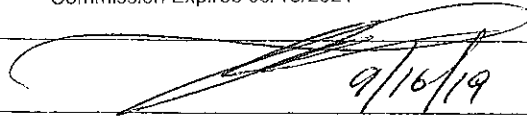
Valmiki Ramani

PH: 718-291-2978

Email: Valmiki-D.Red

Gmail - Comm

ZLATANKILOVA
Notary Public, State of New York
Reg. No. 01AK6355611
Qualified in Queens County
Commission Expires 03/13/2021


9/16/19

Exhibits Attached:

"A" - Doctor's report.

Civil Court of the City of New York
County of Queens

VALMIKI RAMANI

Plaintiff(s)

-against-

AMAZON.COM

Defendant(s)

ORIGINAL PAPERS
RECEIVED
SEP 18 2019
CLERK
QUEENS COUNTY

Index no: CV-031556-19/QU

Affidavit of Service of Summons
with Endorsed Complaint
(Personal and Corporate)

State of New York, County of Queens ss: -

Zlata Akilova

(Name of Server)

, being duly sworn, deposes and says:

I am over 18 years of age and **not a party** to this action.

At _____, AM/PM, on 09/17/19 at 139-09 84th Drive 1A Briarwood, NY 11435
(Time) (Date) (Address)

in the County of Queens, City/State of New York, I served the attached
(Name of County)

SUMMONS WITH ENDORSED COMPLAINT in this matter on Amazon.com
(Name of Defendant as Shown Above)

by delivering the said SUMMONS to:

Fax (206) 266-7010 subpoena-civil@Amazon.com who is:
(Name of actual person with whom the SUMMONS was left)

☐ The said defendant in person,

or,

☐ known to me to be the _____ of the Amazon Civil Process
(Title) (Corporation/Partnership)

Description of Individual Served in Person:

Sex: _____ Color of Skin: _____ Color of Hair: _____
Approximate Age: _____ Approximate Weight: _____ Approximate Height: _____

Sworn to before me this 17 day of 9, 20 19

[Signature]
(Notary Public)

[Signature]
(Signature of Deponent)

AKILOV SION
Notary Public, State of New York
Reg. No. 01AK6045819
Qualified in Queens County
Commission Expires July 31, 2022

Civil Court of the City of New York
County of Queens

Index Number: **CV-031556-19/QU**

VALMIKI RAMANI
Plaintiff(s)
-against-
AMAZON.COM
Defendant(s)

**AMENDED SUMMONS WITH
ENDORSED
COMPLAINT**
BASIS OF VENUE: Plaintiff's residence

Plaintiff's Address (s) :
VALMIKI RAMANI
139-05 85 DR
APT 6D
BRIARWOOD, NY 11435

To the named defendant (s)
AMAZON.COM (Deft), at 410 TERRY AVE N, Seattle, WA 98109

YOU ARE HEREBY SUMMONED to appear in the Civil Court of the City of New York, County of Queens at the office of the Clerk of the said Court at **89-17 Sutphin Boulevard** in the **County of Queens, City and State of New York**, within the time provided by law as noted below and to file your answer to the (endorsed summons) (annexed complaint) * with the Clerk; upon your failure to answer, judgment will be taken against you for the total sum of **\$25,000.00** and interest as detailed below. Plaintiff's work sheet may be attached for additional information if deemed necessary by the clerk.

Date: September 17, 2019

Alia Razzaq
Chief Clerk

ENDORSED COMPLAINT

The nature and the substance of the plaintiff's cause of action is as follows: **NEW DEVELOPMENT OF PHYSICAL DAMAGE TO MY BODY-SKIN HAS DEVELOPED AS A RESULT OF DEFECTIVE PRODUCT SOLD - LEAKING TOXIC GEL ON MY SKIN. I'AM ASKING THE MAXIMUM THIS COURT ALLOWS OF \$25,000.00**

****NOTE TO THE DEFENDANT***

*A) If the summons is served by its delivery to you personally within the City of New York, you must appear and answer within **TWENTY** days after such service; or*

*B) If the summons is served by delivery to any person other than you personally, or is served outside the City of New York, or by publication, or by any means other than personal delivery to you within the City of New York, you are allowed **THIRTY** days after the proof of service thereof is filed with the Clerk of this Court within which to appear and answer.*

C) Following CPLR 321(a) corporations must be represented by an attorney.

**** NOTE TO THE SERVER OF THE SUMMONS***

The person who serves the summons should complete the Affidavit of Service and shall file it in the Clerk's Office in the county where the action is brought.

PLAINTIFF'S CERTIFICATION
(See 22NYCRR, Section 130-1.1a)

SIGN NAME:
PRINT NAME:


VALMIKI RAMANI

Civil Court the City of New York
County of Queens : PART

INDEX NO

CV-031556-19/Qu

Valmiki Ramani Plaintiff

against

Amendment to

Amazon - Com Defendant

Summons - Complaint

STATE OF New York - County of Queens:

I Valmiki Ramani plaintiff duly deposes
that since purchasing the Summons - Complaint
index for personal injury compensation through
defective product in the sum of \$5,000, I
hereby increases compensation sought
\$25,000 due to pathogenic development
on the body abdomen, thigh and buttox on
which the gel in ice pad (defective)
has surfaced within the past 8 days.
Photos and physician Reports are attached
as exhibits D and E.

Date 9-25-19

Valmiki Ramani

Plaintiff

VALMiki Ramani

ZLATA AKILOVA
Notary Public, State of New York
Reg. No. 01AK6355611
Qualified in Queens County
Commission Expires 03/13/2021

County of Queens : PART
Valmiki Ramani petitioner
against
Amazon - Com respondent

INDEX NO
CV-03156-19/QU

AFFIDAVIT OF SERVO

State of New York County of Queens:

Email

deposes and says:

being duly sworn

I am over 18 years old and not a party to this action.

ON 9-25-19 I served Geoffrey Brownell

Defendant Legal Agent in New York via "Geoffrey Brownell @ DWT.

Com" and Defendant Amazon - Com via Email

at "Subena - civil @ Amazon Com" immediately

Summons and Complaint and exhibits

Service to Defendant and defendant's

agent cannot be done via personal service

and only through via Fax and Email.

Signature:

Sworn to before me day of 9-2019 X

notary public

BORUKHOV BORIS
Notary Public, State of New York
No. 01804347773

Qualified in Queens County
Commission Expires 09/09/20

9/25/19

B. RUC

Exhibits

15



Extra Large Ice Pack for Injuries - Covers
Entire Back, Hips, Neck and Spine.
Reusable and Flexible Direct from The
Freezer (by Magic Gel)

75

\$23⁹⁹

Get it as soon as Wed, Sep 18

FREE Shipping on orders over \$25 shipped by
Amazon

Exhibit B

HAZARIAN MEDICAL ASSOCIATES PLLC

4338 44TH STREET SUNNYSIDE NEW YORK 11104

7287862734


RE: RAMANI, VALMIKI

DOB 11/24/1948

TO WHOM IT MAY CONCERN:

THE ABOVE PATIENT IS UNDER MY MEDICAL CARE FOR MULTIPLE MEDICAL PROBLEMS SEEN IN MY OFFICE ON 09/25/19 C/O SEVERAL NEW SKIN LESIONS INVOLVING HIS LEFT FLANK AND ABDOMEN OVERLYING THE AREA WITH PREVIOUS LEAKAGE OF AN ICE PACK USED BY PATIENT IN ORDER TO ALLEVIATE PAIN IN THE AREA OCCURRING APPROXIMATELY TWO WEEKS AGO. PHYSICAL EXAM REVEALS SEVERAL AREAS OF VARYING SIZES OF HYPERPIGEMNTED DERMATITIS OVERLYING LEFT ANTERIOR LOWER ABDOMEN, LEFT FLANK AND BUTTOCKS. TOPICAL TREATMENTS ARE ADVISED. PLEASE CONTACT ME IF YOU HAVE ANY FURTHER QUESTIONS OR CONCERNS.

SINCERELY,



ARTHUR HAZARIAN MD.
43-28 44th STREET
SUNNYSIDE CITY, NY 11104

ARTHUR HAZARIAN MD

09/25/2019

Patient: VALMIKI D. RAMANI
Date of Service: 10/11/2019

MRN:5490982

DOB: Nov 24, 1948

13. Multiple Vitamins TABS;
Therapy: (Recorded:05Sep2012) to Recorded
14. Niacin TABS;
Therapy: (Recorded:05Sep2012) to Recorded
15. Olopatadine HCl - 0.1 % Ophthalmic Solution (Patanol); INSTILL 1 DROP INTO AFFECTED EYE(S) TWICE DAILY AS DIRECTED;
Therapy: 02Jan2019 to (Evaluate:20Jan2019) Requested for: 02Jan2019; Last Rx:02Jan2019 Ordered
16. Pazeo 0.7 % Ophthalmic Solution; INSTILL 1 DROP IN BOTH EYES 2 TIMES DAILY;
Therapy: 21Feb2019 to (Evaluate:19Oct2019) Requested for: 22Apr2019; Last Rx:22Apr2019 Ordered
17. Symbicort 160-4.5 MCG/ACT Inhalation Aerosol; INHALE 2 PUFFS Twice daily;
Therapy: 11Jun2019 to (Last Rx:17Sep2019) Requested for: 17Sep2019 Ordered
18. trazODone HCl - 50 MG Oral Tablet;
Therapy: (Recorded:05Sep2012) to Recorded
19. Ventolin HFA 108 (90 Base) MCG/ACT Inhalation Aerosol Solution; INHALE 1 TO 2 PUFFS EVERY 4 TO 6 HOURS AS NEEDED;
Therapy: 17Sep2019 to (Evaluate:15Mar2020) Requested for: 17Sep2019; Last Rx:17Sep2019 Ordered

Signatures

Electronically signed by : LINDSEY BORDONE, M.D.; Oct 13 2019 11:40AM EST (Author)

Columbia Dermatology

lateral

wednesday 28 2016
2 new spots appear
on Leg and
Buttoux

[Buttoux]

[Leg]

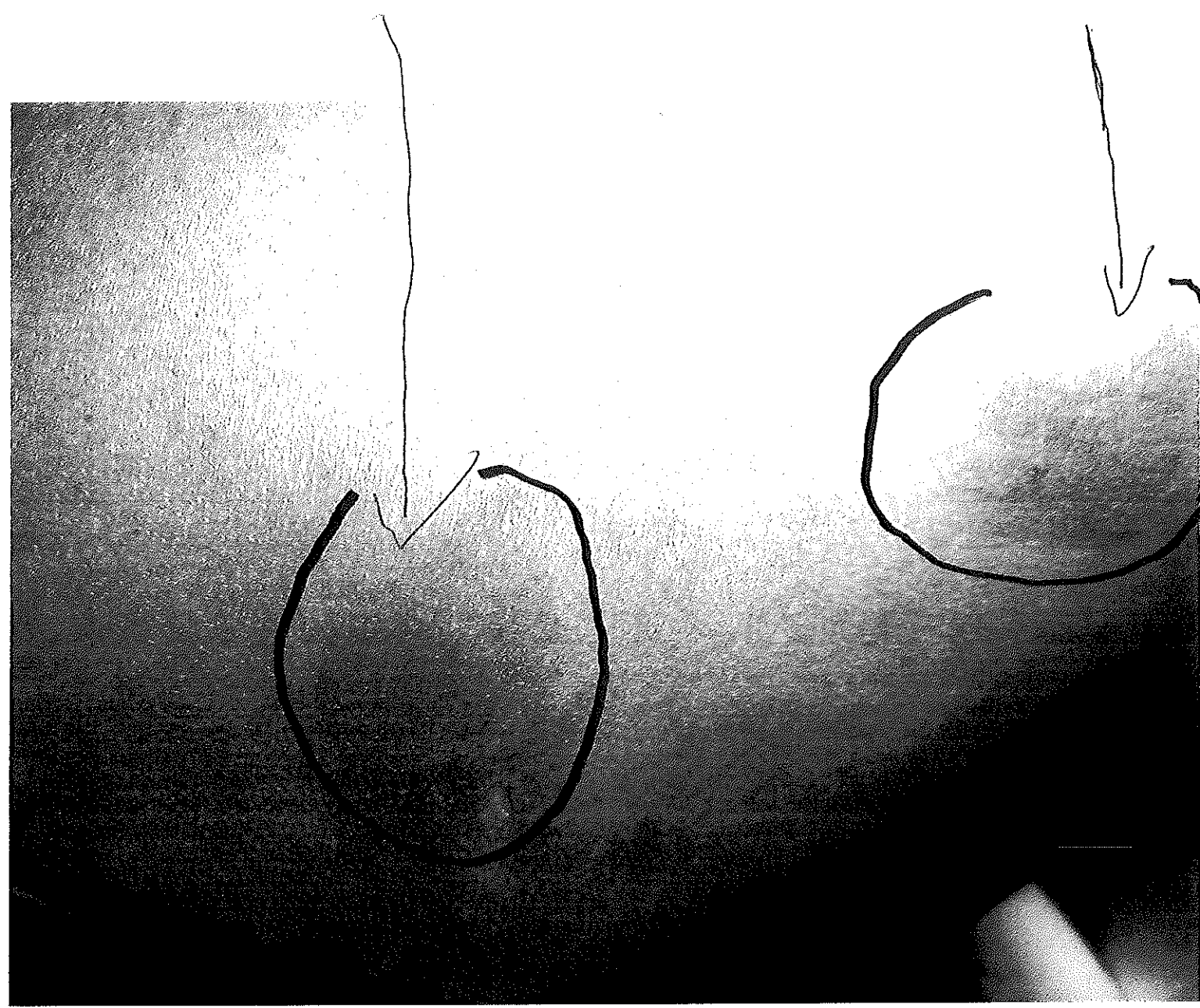


Exhibit D

Index no

Amazon Reply to complaint
of defective product p1

Amazon.com Customer Service <cs-reply@amazon.com>

to me

Hello,

I certainly understand that you have returned your "Extra Large Ice Pack for Injuries", also you are concerned about the gel being exposed to your abdomen.

Please accept my sincere apologize for the inconvenience, this is definitely not what we want our valued customers to experience. Please do not worry, I'll be helping you out in this regard.

Firstly, I appreciate your effort in bringing this to our knowledge. I have marked this as priority and I've forwarded your comments to our concern department to ensure that this is not repeated in future. I understand that this must be disappointing. We certainly never wanted our customers to face such situations.

We would never want to disappoint a valued customer like you as we always endeavor to assist our customers with the best of our service, however, sometimes we fail to do so due to factors out of our control.

Our officials will investigate this particular issue and work on taking necessary actions to correct this error in future.

One more time we apologize for this error and would like to express our gratitude for the patience and understanding you have displayed thus far. We hope to keep you as part of our valued customer base for a very long time.

Regarding the return we'll send you a confirmation mail once we scan in our fulfillment center.

Rest assured, we'll continue working hard to ensure that you receive accurate service, and to minimize the chances of anything like this occurring again.

It is our privilege to have you as our valued customer & we want to make sure you are always taken care of.

Mon, Sep 6, 3:21 PM (15 days ago)

Amazon Reply to Complaint
To defective Product P2

It is our privilege to have you as our valued customer & we want to make sure you are always taken care of.

As an Amazon representative, I always love to fulfill my duty as I tried to be precise and accurate in the reply, however, if I've missed anything or if you wish to ask something else, please don't hesitate to write back to us.

I really appreciate your patience and understanding with continued support. We look forward to see you soon as a happy customer.

Thank you for your inquiry. Did I solve your problem?

If yes, please click here:

http://www.amazon.com/gp/help/survey?pf_rd=A-T3DQGO1HCL18&pf_rd_p=A-T3DQGO1HCL18&pf_rd_r=A-T3DQGO1HCL18&pf_rd_t=1&pf_rd_type=Survey

If no, please click here:

http://www.amazon.com/gp/help/survey?pf_rd=A-T3DQGO1HCL18&pf_rd_p=A-T3DQGO1HCL18&pf_rd_r=A-T3DQGO1HCL18&pf_rd_t=1&pf_rd_type=Survey

Best Regards,

Rain song

Amazon.com

Your feedback is helping us build Earth's Most Customer-Centric Company.

<http://www.amazon.com/your-account>

Proof of purchase
of Ice pack.

(This information is not correct)

Order Placed: August 21, 2019

Amazon.com order number: 111-8674163-5979409

Order Total: \$31.98

Shipped on August 27, 2019

Items Ordered

Price

1 of: *The Vitamin Shoppe Lactase Enzyme 125MG, Supports Lactase or Dairy Digestion, Natural Support for Healthy Digestion (100 Softgels)* \$7.99

Sold by: The Vitamin Shoppe ([seller profile](#))

Condition: New

1 of: *Extra Large Ice Pack for Injuries - Covers Entire Back, Hips, Neck and Spine.* \$23.99

Reusable and Flexible Direct from The Freezer (by Magic Gel)

Sold by: Stretton Online ([seller profile](#))

Condition: New

Shipping Address:

valmiki ramani

139-05 85 dr

6d

briarwood, ny 11435

United States

Item(s) Subtotal: \$31.98

Shipping & Handling: \$8.72

Free Shipping: -\$8.72

Total before tax: \$31.98

Sales Tax: \$0.00

Shipping Speed:

FREE Shipping

Total for This Shipment: \$31.98

Payment information

Payment Method:

MasterCard | Last digits: 3340

Item(s) Subtotal: \$31.98

Shipping & Handling: \$8.72

Free Shipping: -\$8.72

Total before tax: \$31.98

Estimated tax to be collected: \$0.00

Billing address

valmiki ramani

139-05 85 dr

6d

briarwood, ny 11435

United States

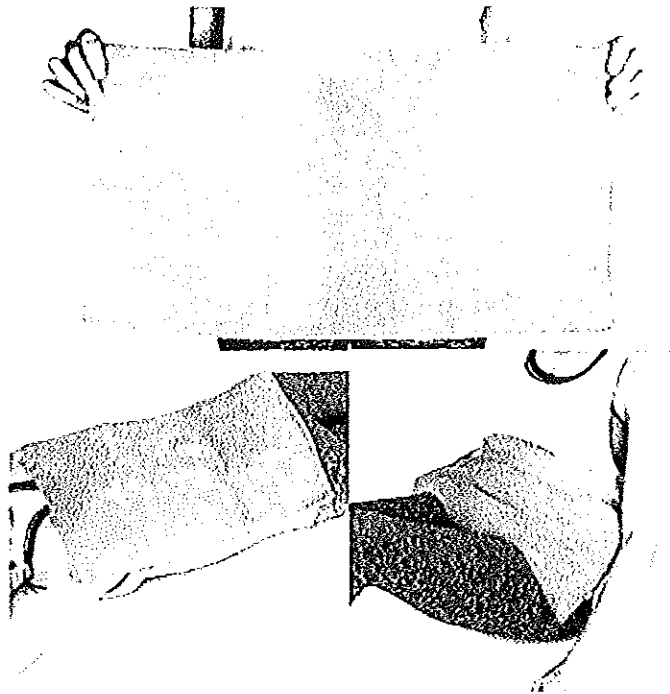
Grand Total: \$31.98

Credit Card transactions

MasterCard ending in 3340: August 27, 2019: \$31.98

To view the status of your order, return to [Order Summary](#).

Product Bought
that proved defective



IceWraps Flexible Icing Compress for
Therapy 12"x21" Reusable Oversize
Multipurpose Cold Clay Pack for Back,
Sciatica, Knee, Hip Pain Relief - Includ...

209

\$23⁹⁹

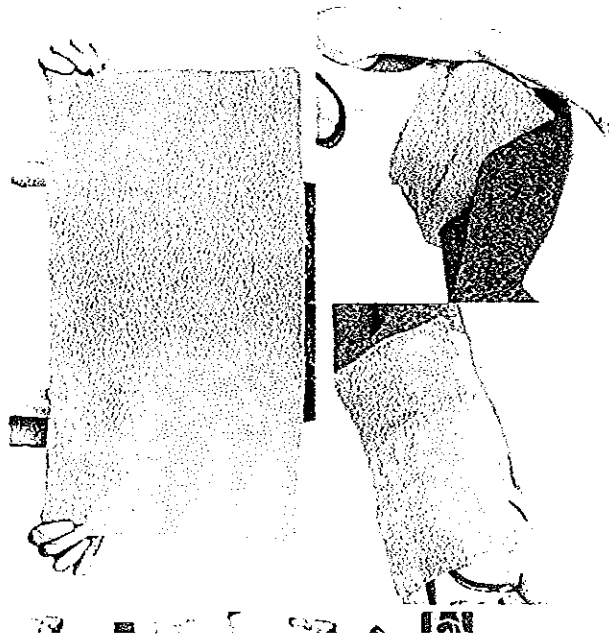
Get it as soon as Tomorrow, Oct 3

FREE Shipping on orders over \$25 shipped by
Amazon

FSA or HSA eligible

Display of product bought that proved defective, displayed on Amazon website
 Note in circle this is a product that Amazon bought from a producer and keeps in its stock

THE ICEWRAPS FLEXIBLE Icing Compress, and more



Roll over image to zoom in

IceWraps Flexible Icing Compress for Therapy 12"x21" Reusable Oversize Multipurpose Cold Clay Pack for Back, Sciatica, Knee, Hip Pain Relief - Includes Free Bonus Fabric Cover

by IceWraps

209 ratings | 17 answered questions

Price: \$23.99 & FREE Shipping on orders over \$25 shipped by Amazon. Details

Get \$60 off instantly: Pay \$0.00 upon approval for the Amazon.com Store Card.

- Flexible when frozen and long lasting - Inner filling is made with all-natural healing clay and oils. Formulated to release at a stable and soothing cool temperature over an extended period of time.
- Extra Large 12"x21". Includes soft washable fabric cover to keep skin comfortable & dry from condensation.
- Recommended by doctors for preventing injuries or post surgery recovery. Stays cold up to 45 minutes.
- Great for chronic pain, pinched nerve, sciatica, joint inflammation, hip injury, arthritis, or bursitis.
- IceWraps is committed to your satisfaction and stands by its 1 year warranty against any quality issues.

1 new from \$23.99

☐ Report incorrect product information.

\$23.99

& FREE Shipping on orders over \$25 shipped by Amazon. Details

Arrives: Oct 8 - 11

Fastest delivery: Tomorrow

Order within 10 hrs 30 mins

© Deliver to valmiki - Blairwood 11435

In Stock.

Qty: 1



Add to Cart



Buy Now

Sold by IceWraps and Fulfilled by Amazon.

FSA or HSA eligible Detail.

IN STOCK!

ORDER PLACED

August 21, 2019

TOTAL

\$31.98

SHIP TO

valmiki ramani

Return complete

Your return is complete. Your refund has been issued. When will I get my refund?

Track

View

Le

Wri



Extra Large Ice Pack for Injuries - Covers Entire Back, Hips, Neck and Spine. Reusable and Flexible Direct from The Freezer (by Magic Gel)

Sold by: Stretton Online

\$23.99

Buy it again

A copy of my return
of defective product

CIVIL COURT OF THE CITY OF NEW YORK
COUNTY OF QUEENS

VALMIKI RAMANI

Plaintiff,

- against -

AMAZON.COM,

Defendant

STIPULATION OF SETTLEMENT

Index No. CV-026077-19, QU

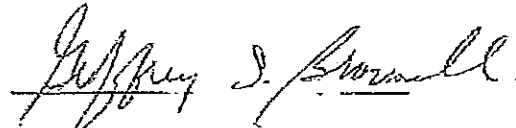
It is hereby stipulated and agreed by and between the parties that the above-referenced action is settled as follows:

Defendant Amazon.com ("Amazon") shall pay Plaintiff Valmiki Ramani ("Plaintiff") two-thousand dollars (\$2,000.00). In exchange, Plaintiff agrees to discontinue this lawsuit with prejudice and relieve, release and forever discharge Amazon and each of its affiliates, subsidiaries, attorneys, agents, officers, directors, shareholders, members, and employees (collectively "Representatives") of and from any and all losses, liabilities, demands, costs, expenses, damages, claims, suits, actions and causes of action of whatever kind or nature against Amazon and its Representatives arising from or relating to this litigation.

This Stipulation may be signed in counterparts and facsimile signatures are valid and binding.


Plaintiff Valmiki Ramani

02/23/2019


Geoffrey Brounell, counsel for Defendant
Amazon.com

Dated:

02/26/2019

CIVIL COURT OF THE CITY OF NEW YORK
COUNTY OF QUEENS

VALMIKI RAMANI,

Plaintiff,

- against -

AMAZON.COM,

Defendant.

STIPULATION OF
DISCONTINUANCE WITH
PREJUDICE

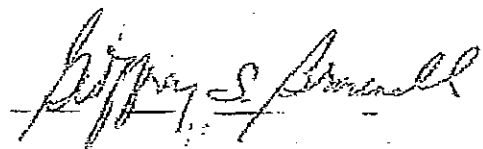
Index No. CV-026077-19/QU

IT IS HEREBY STIPULATED AND AGREED by the undersigned that whereas no party hereto is an infant or an incompetent person for whom a committee or conservatee has been appointed, and no person not a party has an interest in the subject matter of the action, the above-captioned action, and all claims and counterclaims asserted herein, are discontinued with prejudice and without costs to either party as against the other.

This Stipulation may be signed in counterparts and facsimile signatures are valid and binding.


Plaintiff Valmiki Ramani

3 2019
Dated:


Tracy Brown, counsel for Defendant
Amazon.com

Dated: 2/26/2019

CIVIL COURT OF THE CITY OF NEW YORK
COUNTY OF QUEENS

VALMIKI RAMANI

Plaintiff,

- against -

AMAZON.COM,

Defendant


STIPULATION OF SETTLEMENT

Index No. CV-026077-19, QU

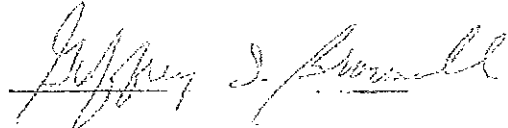
It is hereby stipulated and agreed by and between the parties that the above-referenced action is settled as follows:

Defendant Amazon.com ("Amazon") shall pay Plaintiff Valmiki Ramani ("Plaintiff") two-thousand dollars (\$2,000.00). In exchange, Plaintiff agrees to discontinue this lawsuit with prejudice and relieve, release and forever discharge Amazon and each of its affiliates, subsidiaries, attorneys, agents, officers, directors, shareholders, members, and employees (collectively "Representatives") of and from any and all losses, liabilities, demands, costs, expenses, damages, claims, suits, actions and causes of action of whatever kind or nature against Amazon and its Representatives arising from or relating to this litigation.

This Stipulation may be signed in counterparts and facsimile signatures are valid and binding.


Plaintiff Valmiki Ramani

2/23/2019



Jeffrey S. Brounell, counsel for Defendant
Amazon.com

Dated: 2/23/2019

CIVIL COURT OF THE CITY OF NEW YORK
COUNTY OF QUEENS

VALMIKI RAMANI,

Plaintiff

- against -

AMAZON.COM,

Defendant.

STIPULATION OF
DISCONTINUANCE WITH
PREJUDICE

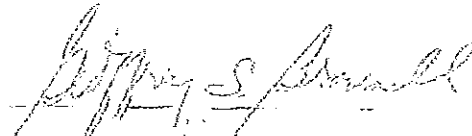
Index No. CV-026677-19/QU

IT IS HEREBY STIPULATED AND AGREED by the undersigned that whereas no party hereto is an infant or an incompetent person for whom a committee or conservator has been appointed, and no person not a party has an interest in the subject matter of the action, the above-captioned action, and all claims and counterclaims asserted herein, are discontinued with prejudice and without costs to either party as against the other.

This Stipulation may be signed in counterparts and facsimile signatures are valid and binding.



Plaintiff Valmiki Ramani



Jeffrey S. Bernick, counsel for Defendant
Amazon.com

Dated: 2/26/20

Civil Court of the City of New YorkCounty of Queens

Part

Index Number

CV-031556-19/QU

Motion Cal. #

Motion Seq. #

DECISION/ORDER

Recitation, as required by CPLR §2219 (a), of the papers considered in the review of this Motion:

Papers**Numbered**

Notice of Motion and Affidavits Annexed.....

1

Order to Show Cause and Affidavits Annexed.....

Answering Affidavits

Replying Affidavits.....

Exhibits

Other.....

Claimant(s)/Plaintiff(s)/Petitioner(s)

against

Amazon.com

Defendant(s)/Respondent(s)

Upon the foregoing cited papers, the Decision/Order on this Motion to

DefendantsDirect Plaintiffto file a formal pleading

is as follows:

1) denied

2) Endorsed complaint is sufficient pursuant to the standard discussed in Holloway v New York City Transit Authority, 69d NYS 2d 261 (1st Civ Ct NY County 199d).

3) Plaintiff may submit a motion to dismiss based on Photo Service.

Civil Court
of the
City of New York

OCT 22 2019

ENTERED
QUEENS COUNTY
CIVIL COURT

OCT 22 201910/22/19

Date

Judge, Civil Court

John C. V. Katsanos
Hon. John C.V. Katsanos

Service

CV 026077-19 QC

29-07-19 settled 8-26-2019

CIVIL COURT OF THE CITY OF NEW YORK
COUNTY OF QUEENS

Subpoena, Civil Court, Geoffrey Broome

VALMIKI RAMANI,

Plaintiff,

- against -

AMAZON.COM,

Defendant.

AFFIRMATION

Index No. CV-031556-19/QU

X

Taaj M. Reaves, an attorney duly admitted to the Courts of the State of New York,
hereby affirms and states under penalty of perjury as follows:

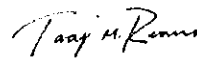
1. I am an associate at the firm Davis Wright Tremaine LLP, attorneys for Defendant Amazon.com ("Amazon").
2. I submit this affirmation in support of Amazon's motion for an order pursuant to § 902(e) of the New York City Civil Court Act ("NYCCA") to direct Plaintiff Valmiki Ramani ("Plaintiff") to serve and file a formal pleading.
3. On September 17, 2019, Plaintiff filed an "Endorsed Complaint," attached as **Exhibit A** (the "Endorsed Complaint"). The Endorsed Complaint was accompanied by what appeared to be a formal pleading. See Exhibit A at 3-8. These documents were served on Amazon on September 17, 2019 via fax and electronic mail. Thus, Amazon has not been properly served with the Endorsed Complaint and reserves its right to move to dismiss on the ground that Plaintiff failed to effectuate proper service.
4. Plaintiff filed a second "Endorsed Complaint," attached hereto as **Exhibit B**, with this Court (the "Second Endorsed Complaint"). Although the Second Endorsed Complaint is also dated September 17, 2019, it was not served on Amazon until September 26, 2017. The Second Endorsed Complaint was also served via fax and electronic mail, and consists of only the

following sentence fragment: “NEW DEVELOPMENT OF PHYSICAL DAMAGE TO MY BODY- SKIN HAS DEVELOPED AS A RESULT OF DEFECTIVE PRODUCT SOLD – LEAKING TOXIC GEL ON MY SKIN. I’AM ASKING THE MAXIMUM THIS COURT ALLOWS OF \$25,000.00.” Amazon has not been properly served with the Second Endorsed Compliant and reserves its right to move to dismiss on the ground that Plaintiff failed to effectuate proper service.

5. Amazon is unable to determine whether Plaintiff’s second “Endorsed Complaint” intends to incorporate the allegations from the formal pleading that accompanied his first “Endorsed Complaint,” or whether Plaintiff is alleging new or different facts in support of his request for increased damages.

6. Accordingly, Amazon is unable to articulate a cogent defense based on the representation in the Endorsed Complaint of Plaintiff’s “nature and substance of the cause of action,” as required by NYCCA § 902(a)(1), and thus respectfully requests that the Court grant its motion and order Plaintiff to file a formal pleading pursuant to § 902(e) of the NYCCA.

Dated: New York, New York
October 4, 2019



Taaj M. Reaves

EXHIBIT B

Civil Court of the City of New York
County of Queens

Index Number: **CV-031556-19/QU**

VALMIKI RAMANI
Plaintiff(s)
-against-
AMAZON.COM
Defendant(s)

**AMENDED SUMMONS WITH
ENDORSED
COMPLAINT**
BASIS OF VENUE: Plaintiff's residence

Plaintiff's Address (s) :
VALMIKI RAMANI
139-05 85 DR
APT 6D
BRIARWOOD, NY 11435

To the named defendant (s)
AMAZON.COM (Deft), at 410 TERRY AVE N, Seattle, WA 98109

YOU ARE HEREBY SUMMONED to appear in the Civil Court of the City of New York, County of Queens at the office of the Clerk of the said Court at **89-17 Sutphin Boulevard** in the **County of Queens, City and State of New York**, within the time provided by law as noted below and to file your answer to the (endorsed summons) (annexed complaint) * with the Clerk; upon your failure to answer, judgment will be taken against you for the total sum of **\$25,000.00** and interest as detailed below. Plaintiff's work sheet may be attached for additional information if deemed necessary by the clerk.

Date: September 17, 2019

Alia Razzaq
Chief Clerk

ENDORSED COMPLAINT

The nature and the substance of the plaintiff's cause of action is as follows: **NEW DEVELOPMENT OF PHYSICAL DAMAGE TO MY BODY-SKIN HAS DEVELOPED AS A RESULT OF DEFECTIVE PRODUCT SOLD - LEAKING TOXIC GEL ON MY SKIN. I'AM ASKING THE MAXIMUM THIS COURT ALLOWS OF \$25,000.00**

****NOTE TO THE DEFENDANT***

*A) If the summons is served by its delivery to you personally within the City of New York, you must appear and answer within **TWENTY** days after such service; or*

*B) If the summons is served by delivery to any person other than you personally, or is served outside the City of New York, or by publication, or by any means other than personal delivery to you within the City of New York, you are allowed **THIRTY** days after the proof of service thereof is filed with the Clerk of this Court within which to appear and answer.*

C) Following CPLR 321(a) corporations must be represented by an attorney.

**** NOTE TO THE SERVER OF THE SUMMONS***

The person who serves the summons should complete the Affidavit of Service and shall file it in the Clerk's Office in the county where the action is brought.

PLAINTIFF'S CERTIFICATION
(See 22NYCRR, Section 130-1.1a)

SIGN NAME: Valmiki Ramani
PRINT NAME: VALMIKI RAMANI

15



Extra Large Ice Pack for Injuries - Covers
Entire Back, Hips, Neck and Spine.
Reusable and Flexible Direct from The
Freezer (by Magic Gel)

75

\$23⁹⁹

Get it as soon as Wed, Sep 18

FREE Shipping on orders over \$25 shipped by
Amazon

Exhibit B

EXHIBIT A

Civil Court of the City of New York
County of Queens

Index no: CV-031556-19/QU

VALMIKI RAMANI

Plaintiff(s)

-against-

AMAZON.COM

Defendant(s)

Affidavit of Service of Summons
with Endorsed Complaint
(Personal and Corporate)

State of New York, County of Queens ss:

Zlata Akirova
(Name of Server)

, being duly sworn, deposes and says:

I am over 18 years of age and not a party to this action.

At _____, AM/PM, on 09/17/19 at 139-09 84th Drive 1A Briarwood, NY 11435
(Time) (Date) (Address)

in the County of Queens, City/State of New York, I served the attached
(Name of County)

SUMMONS WITH ENDORSED COMPLAINT in this matter on Amazon.com
(Name of Defendant as Shown Above)

by delivering the said SUMMONS to:

Fax (206) 266-7010 subpoena-civil@Amazon.com who is:
(Name of actual person with whom the SUMMONS was left)

☐ The said defendant in person,

or,

☐ known to me to be the _____ of the Amazon Civil Process
(Title) (Corporation/Partnership)

Description of Individual Served in Person:

Sex: _____ Color of Skin: _____ Color of Hair: _____
Approximate Age: _____ Approximate Weight: _____ Approximate Height: _____

Sworn to before me this 17 day of 9, 20 19

[Signature]
(Notary Public)

[Signature]
(Signature of Deponent)

AKILOV SION
Notary Public, State of New York
Reg. No. 01AK6045819
Qualified in Queens County
Commission Expires July 31, 2022

Civil Court of the City of New York
County of Queens

Index Number: **CV-031556-19/QU**

VALMIKI RAMANI
Plaintiff(s)
-against-
AMAZON.COM
Defendant(s)

**SUMMONS WITH ENDORSED
COMPLAINT**

BASIS OF VENUE: Plaintiff's residence

Plaintiff's Address (s) :
VALMIKI RAMANI
139-05 85 DR
APT 6D
BRIARWOOD, NY 11435

To the named defendant (s)
AMAZON.COM (Deft), at 410 TERRY AVE N, Seattle, WA 98109

YOU ARE HEREBY SUMMONED to appear in the Civil Court of the City of New York, County of Queens at the office of the Clerk of the said Court at 89-17 Sutphin Boulevard in the County of **Queens, City and State of New York**, within the time provided by law as noted below and to file your answer to the (endorsed summons) (annexed complaint) * with the Clerk; upon your failure to answer, judgment will be taken against you for the total sum of \$5,000.00 and interest as detailed below. Plaintiff's work sheet may be attached for additional information if deemed necessary by the clerk.

Date: September 17, 2019

Alia Razzaq
Chief Clerk

ENDORSED COMPLAINT

The nature and the substance of the plaintiff's cause of action is as follows: **Personal Injuries; Other: Defective product for \$5,000.00 with interest from 09/06/2019**

****NOTE TO THE DEFENDANT***

A) If the summons is served by its delivery to you personally within the City of New York, you must appear and answer within TWENTY days after such service; or

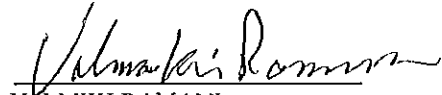
B) If the summons is served by delivery to any person other than you personally, or is served outside the City of New York, or by publication, or by any means other than personal delivery to you within the City of New York, you are allowed THIRTY days after the proof of service thereof is filed with the Clerk of this Court within which to appear and answer.

C) Following CPLR 321(a) corporations must be represented by an attorney.

**** NOTE TO THE SERVER OF THE SUMMONS***

The person who serves the summons should complete the Affidavit of Service and shall file it in the Clerk's Office in the county where the action is brought.

PLAINTIFF'S CERTIFICATION
(See 22NYCRR, Section 130-1.1a)

SIGN NAME: 
PRINT NAME: VALMIKI RAMANI

The Civil Court of New York
County of Queens:

VALMIKI RAMANI

PLAINTIFF

against

INDEX NO:

Amazon.com
Defendant

COMPLAINT

① In the Civil Court of New York State, County of Queens,
I, Valmiki Ramani, plaintiff of 139-05 85 DR
APT 6D, Briarwood ny 11435, here by deposes
the following to be true against online vendor
Amazon.com INC of 410 TERRY AVE W
Seattle WA 98109, that during the month
of September 2019 I ordered and received one
12 x 21 inches ICE WRAP Icing Compress at a
cost of \$23.99, as shown in exhibit A attached.

② I placed it in the Fridge's Freezer so it
can become cold and then began to
use it placed in a pink cotton tee shirt to
avoid frost bite, in use part was around my
left hip and the remainder on my abdomen.
The first and second times I used it were
successful, however the third time I used
it was different, I was laying on a towel
on the bed with Ice pack (extra Large)
strapped on me, my hand was on my side,

(1)

left, when I felt a cold liquid on it, I immediately got up took the ice pack off my body, only to find there was a clear liquid gel on my abdomen and running down my left hip onto the towel. I immediately took paper towel and wiped the gel off my body, and took the ice pack and placed it in a plastic bag after looking to see where the gel came out from. It appears there were at least three 1.5 cm circle which looked like caps, it was from there the gel was leaking out. I then noticed that the area that the gel was on my skin had taken on a pink to red colour. I then proceeded to take a shower to wash the gel from my body fearing it was toxic.

- (3) I then took a steroid cream I was prescribed by my doctor for other skin problems and mixed it with Eucerin lotion to form a compound and rubbed my pink to red skin, I then took Sarin wrap and wrapped my abdomen and around my body with it so I could put on clothes.

(2)

- 4) I then made a call to my primary care physician, and told him what had happened and how I handled it. He approved and told me to immediately report to him any changes over several days of treatment. My abdomen showed some improvement, however afraid of being exposed by toxins, I went in on 9-16-19 to my physician to show him my abdomen.
- 5) I have sustained injury to my skin on my abdomen, and do not know if any toxins have entered my body through the leakage of the ice wrap content onto my body, for this I am being observed by my physician.
- 6) Amazon.com has been at fault for selling poor quality and defective product to be used on human skin-body, I was told to return it to them which I did by return UPS Label number 1Z6U51Y19038957572, it was received.
- 7) For injury suffered by Amazon.com defective product, I am seeking monetary compensation of \$5,000.00.

from the seller of Ice wrap extra large
icing compress 12x21 inches sold
at the price of \$23.99.

Valmiki Ramani

Plaintiff

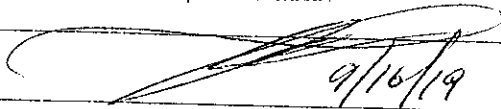
Valmiki Ramani

PH: 718-291-2978

Email: Valmiki-D.Ra

Gmail-Com

ZLATA AKILOVA
Notary Public, State of New York
Reg. No. 01AK6355611
Qualified in Queens County
Commission Expires 03/13/2021


9/16/19

Exhibits Attached:

"A" - Doctor's report.

HAZARIAN MEDICAL ASSOCIATES PLLC

4338 44TH STREET SUNNYSIDE NEW YORK 11104

7287862734

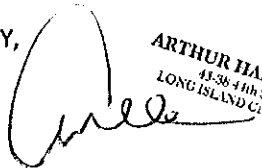
RE: RAMANI, VALMIKI

DOB 11/24/1948

TO WHOM IT MAY CONCERN:

THE ABOVE PATIENT IS UNDER MY MEDICAL CARE FOR MULTIPLE MEDICAL PROBLEMS SEEN IN MY OFFICE ON 09/16/19 FOR ACUTE CONTACT DERMATITIS INVOLVING HIS LEFT FLANK AND ABDOMEN RELATED TO THE LEAKAGE OF AN ICE PACK USED BY PATIENT IN ORDER TO ALLEVIATE PAIN IN THE AREA SEVERAL DAYS AGO. PHYSICAL EXAM REVEALS REDNESS, INFLAMMATION, AND TENDERNESS. TOPICAL TREATMENTS WERE ADVISED. PLEASE CONTACT ME IF YOU HAVE ANY FURTHER QUESTIONS OR CONCERNS.

SINCERELY,



ARTHUR HAZARIAN MD.
43-38 44TH STREET
LONG ISLAND CITY, NY 11104

ARTHUR HAZARIAN MD

09/16/2019

Exhibit "A"

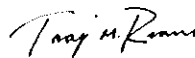
CIVIL COURT OF THE CITY OF NEW YORK
COUNTY OF QUEENS

-----	x	
VALMIKI RAMANI,	:	
	:	NOTICE OF MOTION
Plaintiff,	:	
	:	
- against -	:	
	:	Index No. CV-031556-19/QU
AMAZON.COM,	:	
	:	
Defendant.	:	
-----	x	

PLEASE TAKE NOTICE that, upon the accompanying Affirmation of Taaj M. Reaves, dated October 4, 2019, the exhibits annexed thereto, the accompanying memorandum of law, and all other pleadings and proceedings heretofore had herein, defendant Amazon.com will move before the Civil Court of the City of New York, County of Queens, 89-17 Sutphin Boulevard, Jamaica, New York 11435, Part 34, Room 306, at 9:30 a.m. on October 22, 2019, or as soon thereafter as counsel may be heard, for an order pursuant to § 902(e) of the New York City Civil Court Act to direct Plaintiff Valmiki Ramani to serve and file a formal pleading.

PLEASE TAKE FURTHER NOTICE that pursuant to CPLR 2214(b), Plaintiff's answering papers, if any, shall be served upon the undersigned on or before October 21, 2019.

Dated: New York, New York
October 4, 2019



Taaj M. Reaves
DAVIS WRIGHT TREMAINE LLP
1251 Avenue of the Americas, 21st Floor
New York, NY 10020
Phone: (212) 489-8230
E-mail: Taajreaves@dwt.com

Attorney for Defendant Amazon.com

CIVIL COURT OF THE CITY OF NEW YORK
COUNTY OF QUEENS

.....	x	
VALMIKI RAMANI,	:	
	:	MEMORANDUM OF LAW
Plaintiff,	:	
	:	
- against -	:	
	:	Index No. CV-031556-19/QU
AMAZON.COM,	:	
	:	
Defendant.	:	
.....	x	

MEMORANDUM OF LAW IN SUPPORT OF DEFENDANT’S
MOTION FOR THE FILING OF A FORMAL PLEADING

Defendant Amazon.com (“Amazon”) submits this memorandum of law in support of its motion for an order to direct Plaintiff Valmiki Ramani (“Plaintiff”) to file a formal pleading pursuant to § 902(e) of the New York City Civil Court Act (“NYCCA”).

Plaintiff filed an “Endorsed Complaint” as the operative pleading in this case. Pursuant to § 902(a)(1) of the NYCCA, “[i]f the plaintiff’s cause of action is for money only, the cause of action may be set forth by indorsement upon the summons. The indorsement shall consist of a statement of the nature and substance of the cause of action.” Section 902(e) permits the court, “on the motion on notice of a party, [to] direct the service and filing of a formal pleading.” *Id.* § 902(e). Courts acknowledge that a motion for the filing of a formal pleading pursuant to § 902(e) is appropriate not only when “courts have doubts regarding the sufficiency of an endorsed complaint,” but also when “defendants wish to obtain more detailed facts regarding plaintiff’s claims.” Holloway v. N.Y. City Transit Auth., 182 Misc. 2d 749, 754, 755 699 N.Y.S.2d 261, 265, 266 (N.Y. City Civil Ct. 1999); see also Gounder v Upton Cohen & Slamowitz, 20 Misc. 3d 141(A) (App Term, 2d & 11th Jud Dists 2008) (“Where a court has doubts regarding the sufficiency of an indorsed complaint, the complaint should not be dismissed

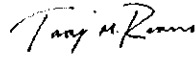
outright, but rather the plaintiff should be directed to serve and file a formal pleading pursuant to CCA 902(e).”); Herman v. East Ramapo Central School District, 99 Misc.2d 696, 698, 416 N.Y.S.2d 1003 (Justice Court, Rockland Co. 1979) (“However, where as in the case at bar the defendant challenges the sufficiency of the complaint, it is appropriate to order plaintiff on the Court’s own motion to serve and file a formal complaint pursuant to Section 902(e).”); Siegel, Practice Commentaries, McKinney’s Consolidated Laws of New York, Judiciary (Book 29A) — New York City Civil Court Act § 903, at 179 (“The only motions that should be available against [the efficacy of statements in endorsed complaints] are those that reasonably seek amplification, such as a motion under § 902(e) to compel the service of a formal pleading.”).

In this case, Plaintiff filed an “Endorsed Complaint,” accompanied by what appeared to be a formal pleading. See Reaves Aff. ¶ 3 & Ex. A. However, Plaintiff later filed a second “Endorsed Complaint” with this Court. Plaintiff’s second “Endorsed Complaint” consists of only the following sentence fragment: “NEW DEVELOPMENT OF PHYSICAL DAMAGE TO MY BODY- SKIN HAS DEVELOPED AS A RESULT OF DEFECTIVE PRODUCT SOLD – LEAKING TOXIC GEL ON MY SKIN. I’AM ASKING THE MAXIMUM THIS COURT ALLOWS OF \$25,000.00.” See Reaves Aff. ¶ 4 & Ex. B. Amazon is unable to determine whether Plaintiff’s second “Endorsed Complaint” intends to incorporate the allegations from the formal pleading that accompanied his first “Endorsed Complaint,” or whether Plaintiff is alleging new or different facts in support of his request for increased damages. See Reaves Aff. ¶ 5. Accordingly, Amazon requests that the Court order Plaintiff to file a formal pleading because Amazon is unable to articulate a cogent defense based on Plaintiff’s representation of his “nature and substance of the cause of action,” as required by NYCCA § 902(a)(1). Indeed, Amazon’s only response to the current indorsed pleading can be to issue a general denial —

forcing the parties into a lengthy and potentially unnecessary discovery process. By contrast, a more fulsome formal pleading would afford both parties the opportunity to assess and potentially resolve this litigation with full knowledge of the relevant factual and legal defenses at the outset.

For the foregoing reasons, Amazon respectfully requests that the Court grant its motion and order Plaintiff to file a formal pleading pursuant to § 902(e) of the NYCCA.

Dated: New York, New York
October 4, 2019



Taaj M. Reaves
DAVIS WRIGHT TREMAINE LLP
1251 Avenue of the Americas, 21st Floor
New York, NY 10020
Phone: (212) 489-8230
E-mail: Taajreaves@dwt.com

Attorney for Defendant Amazon.com

Valmiki Ramani petitioners
against

Amazon - Com respondent

Index no
CV-03156-19/Qu

AFFIDAVIT OF SERVICE

State of New York County of Queens:

Email

Z/ATA Aki/ova being duly sworn
deposes and says:

I am over 18 years old and not a party to this action.

ON 9-25-19 I served Geoffrey Brounell
Defendant Legal agent in New York via "Geoffrey.Brounell@DWT.
Com" and Defendant Amazon - Com via Email
at "Subena-civil@Amazon.Com" ammentent
Summons and Complaint and exhibits
Service to Defendant and defendant's
agent cannot be done via personal service
and only through via Fax and Email.

Signature: 

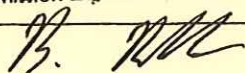
Sworn to before me 25 day of 9-2019 x Z/ATA Aki/ova

Notary public

BORUKHOV BORIS
Notary Public, State of New York
No. 01806347793

Qualified in Queens County
Commission Expires 09/09/20

9/25/19



HAZARIAN MEDICAL ASSOCIATES PLLC

4338 44TH STREET SUNNYSIDE NEW YORK 11104

7287862734

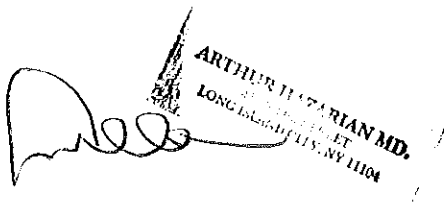
RE: RAMANI, VALMIKI

DOB 11/24/1948

TO WHOM IT MAY CONCERN:

THE ABOVE PATIENT IS UNDER MY MEDICAL CARE FOR MULTIPLE MEDICAL PROBLEMS SEEN IN MY OFFICE ON 09/16/19 FOR ACUTE CONTACT DERMATITIS INVOLVING HIS LEFT FLANK AND ABDOMEN RELATED TO THE LEAKAGE OF AN ICE PACK USED BY PATIENT IN ORDER TO ALLEVIATE PAIN IN THE AREA SEVERAL DAYS AGO. PHYSICAL EXAM REVEALS REDNESS, INFLAMMATION, AND TENDERNESS. TOPICAL TREATMENTS WERE ADVISED. PLEASE CONTACT ME IF YOU HAVE ANY FURTHER QUESTIONS OR CONCERNS.

SINCERELY,

A handwritten signature in black ink, appearing to read "Arthur Hazarian", is written over a professional medical stamp. The stamp is rectangular and contains the text "ARTHUR HAZARIAN MD." at the top, followed by "4338 44TH STREET" and "SUNNYSIDE, NY 11104" at the bottom.

ARTHUR HAZARIAN MD

09/16/2019

Exhibit "A"

Amazon.com Customer Service - cs-reply@amazon.com
to me

Mon, Sep 9, 3:21 PM (5 days ago)

Hello,

I certainly understand that you have returned your "Extra Large Ice Pack for Injuries", also you are concerned about the gel being exposed to your abdomen.

Please accept my sincere apologize for the inconvenience, this is definitely not what we want our valued customers to experience. Please do not worry, I'll be helping you out in this regard.

Firstly, I appreciate your effort in bringing this to our knowledge. I have marked this as priority and I've forwarded your comments to our concern department to ensure that this is not repeated in future. I understand that this must be disappointing. We certainly never wanted our customers to face such situations.

We would never want to disappoint a valued customer like you as we always endeavor to assist our customers with the best of our service, however, sometimes we fail to do so due to factors out of our control.

Our officers will investigate this particular issue and work on taking necessary actions to correct this error in future.

One more time we apologize for this error and would like to express our gratitude for the patience and understanding you have displayed thus far. We hope to keep you as part of our valued customer base for a very long time.

Regarding the return, we'll send you a confirmation mail once we scan in our fulfillment center.

Rest assured, we'll continue working hard to ensure that you receive accurate service, and to minimize the chances of anything like this occurring again.

It is our privilege to have you as our valued customer & we want to make sure you are always taken care of.

It is our privilege to have you as our valued customer & we want to make sure you are always taken care of.

As an Amazon representative, I always love to fulfill my duty as I tried to be precise and accurate in the reply. However, if I've missed anything or if you wish to ask something else, please don't hesitate to write back to us.

I really appreciate your patience and understanding with continued support. We look forward to see you soon as a happy customer.

Thank you for your inquiry. Did I solve your problem?

If yes, please click here:

<http://www.amazon.com/gp/help/survey/202AA413D0G01H0L18K6HY>

If no, please click here:

<http://www.amazon.com/gp/help/survey/202AA413D0G01H0L18K6HY>

Best Regards,

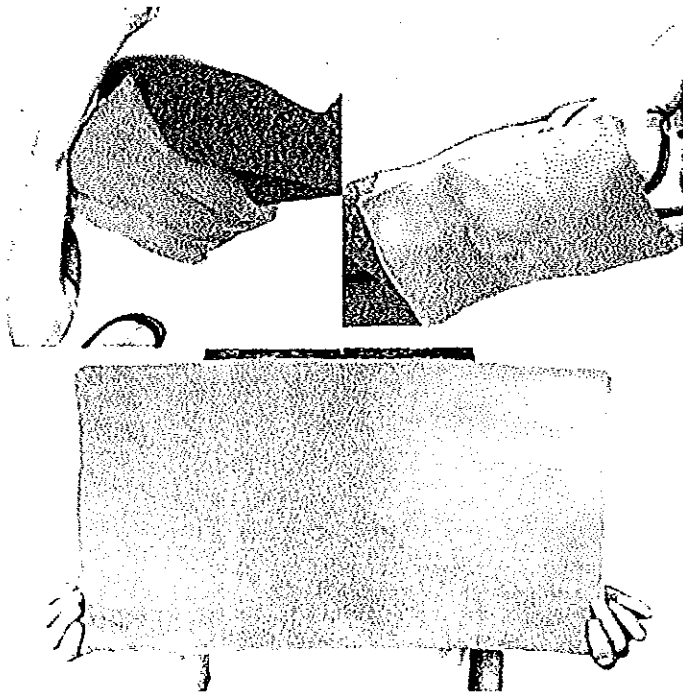
Rain song

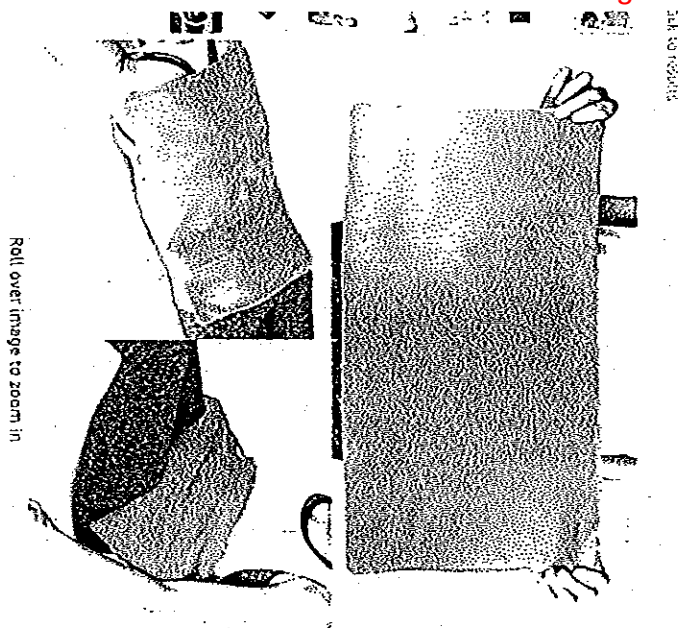
Amazon.com

Your feedback is helping us build Earth's Most Customer-Centric Company.

<http://www.amazon.com/your-account>

IceWraps Flexible Icing Compress for
Therapy 12"x21" Reusable Oversize
Multipurpose Cold Clay Pack for Back,
Sciatica, Knee, Hip Pain Relief - Includ...
\$23.99
Get it as soon as Tomorrow, Oct 3
FREE Shipping on orders over \$25 shipped by
Amazon
FSA or HSA eligible





Roll over image to zoom in

IceWraps Flexible Icing Compress for Therapy 12"x21" Reusable
Oversize Multipurpose Cold Clay Pack for Back, Sciatica, Knee, Hip
Pain Relief - Includes Free Bonus Fabric Cover

by IceWraps
209 ratings | 17 answered questions

Price: \$23.99 & FREE Shipping on orders over \$25 shipped by Amazon. Details

Get \$60 off instantly: Pay \$0.00 upon approval for the Amazon.com Store Card.

- Flexible when frozen and long lasting - Inner filling is made with all-natural healing clay and oils. Formulated to release at a stable and soothing cool temperature over an extended period of time.
- Extra Large - 12"x21", Includes soft, washable fabric cover to keep skin comfortable & dry from condensation.
- Recommended by doctors for preventing injuries or post surgery recovery. Stays cold up to 45 minutes.
- Great for chronic pain, pinched nerve, sciatica, joint inflammation, hip injury, arthritis, or bursitis.
- IceWraps is committed to your satisfaction and stands by its 1 year warranty against any quality issues.

1 new from \$23.99

[Report incorrect product information.](#)

\$23.99

& FREE Shipping on orders over \$25 shipped by Amazon. Details

Arrives: Oct 8 - 11

Fastest delivery: Tomorrow

Order within 10 hrs 30 mins

⊗ Deliver to valmiki - Bidwood

11/155

In Stock.

Qty: 1

[Add to Cart](#)

[Buy Now](#)

Sold by IceWraps and Fulfilled by Amazon.

FSA or HSA eligible Details

Return complete
Your return is complete. Your refund has been issued. When will I get my refund?

Extra Large Ice Pack for Injuries - Covers Entire Back, Hips, Neck and Spine. Reusable and
Flexible Direct from The Freezer (by Magic Gel)

Sold by: Stretton Online

\$23.99

[Buy it again](#)



OR

SHIP TO

TOTAL
\$31.98

ORDER PLACED
August 21, 2019

valmiki ramani

[Track](#)

[View](#)

[Learn](#)

[Wait](#)

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to me

Mon, Sep 9, 3:21 PM (5 days ago)

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If yes, please click here:

<https://www.amazon.com/gp/help/survey/202A-113D0G01HCL1X&ref=lv>

If no, please click here:

<https://www.amazon.com/gp/help/survey/202A-113D0G01HCL1X&ref=lv>

Best Regards,

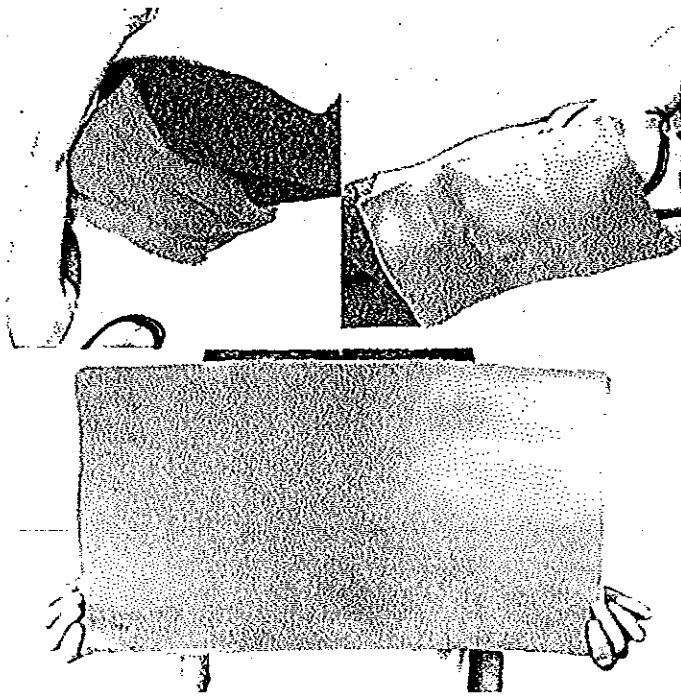
Rain song

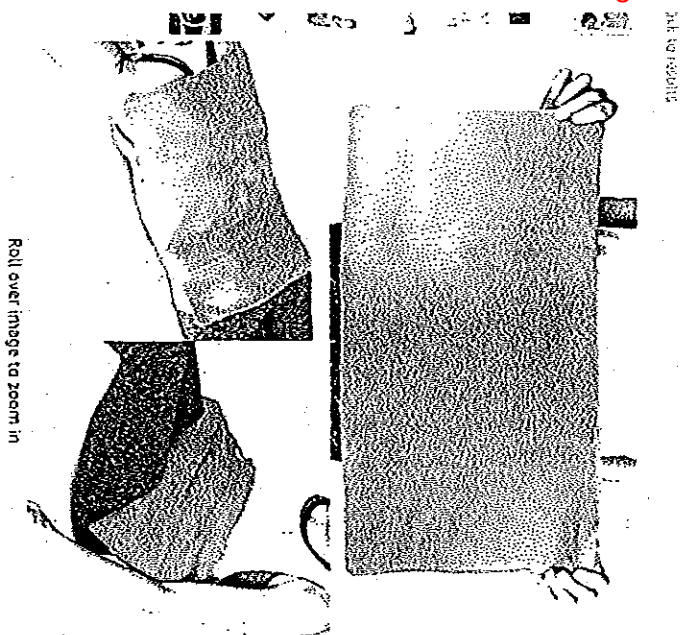
Amazon.com

Your feedback is helping us build Earth's Most Customer-Centric Company.

<https://www.amazon.com/you-are-our>

IceWraps Flexible Icing Compress for
Therapy 12"x21" Reusable Oversize
Multipurpose Cold Clay Pack for Back,
Sciatica, Knee, Hip Pain Relief - Includ...
209
\$23.99
Get it as soon as Tomorrow, Oct 3
FREE Shipping on orders over \$25 shipped by
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FSA or HSA eligible





Roll over image to zoom in

IceWraps Flexible Icing Compress for Therapy 12"x21" Reusable
Oversize Multipurpose Cold Clay Pack for Back, Sciatica, Knee, Hip
Pain Relief - Includes Free Bonus Fabric Cover

by IceWraps
209 ratings | 17 answered questions

Price: \$23.99 & FREE Shipping on orders over \$25 shipped by Amazon. Details

Get \$50 off instantly: Pay \$0.00 upon approval for the Amazon.com Store Card.

- Flexible when frozen and long lasting - Inner filling is made with all-natural healing clay and oils. Formulated to release at a stable and soothing cool temperature over an extended period of time.
- Extra Large 12"x21". Includes soft, washable fabric cover to keep skin comfortable & dry from condensation.
- Recommended by doctors for preventing injuries or post surgery recovery. Stays cold up to 45 minutes.
- Great for chronic pain, pinched nerve, sciatica, joint inflammation, hip injury, arthritis, or bursitis.
- IceWraps is committed to your satisfaction and stands by its 1 year warranty against any quality issues.

1 new from \$23.99

☐ Report incorrect product information.

\$23.99

& FREE Shipping on orders over \$25 shipped by Amazon. Details

Arrives: Oct 8 - 11

Fastest delivery: Tomorrow

Order within 10 hrs 30 mins

⊙ Deliver to Valmiki - Briarwood

11435

In Stock.

Qty: 1

Sold by IceWraps and Fulfilled by Amazon.

FSA or HSA eligible Details

Extra Large Ice Pack for Injuries - Covers Entire Back, Hips, Neck and Spine. Reusable and
Flexible Direct from The Freezer (by Magic Gel)

Sold by: Stretton Online
\$23.99

Buy it again



Return complete

Your return is complete. Your refund has been issued. When will I get my refund?

Write

Leave

View

Track

ORDER PLACED
August 21, 2019

TOTAL
\$31.98

SHIP TO
valmiki ramani

OR



Full view photo to learn more

Shop early, last early, and more

IceWraps Flexible Icing Compress for Therapy 12"x21" Reusable Oversize Multipurpose Cold Clay Pack for Back, Sciatica, Knee, Hip Pain Relief - Includes Free Bonus Fabric Cover

by IceWraps

200 ratings | 13 answered questions

Price: **\$23.99 & FREE Shipping** on orders over \$25 shipped by Amazon. Details

Get \$20 off your order. Buy \$20.00 upon approval for the Amazon.com Store Card.

- Flexible when frozen and long lasting - Inner filling is made with all-natural healing clay and oils. Formulated to release at a stable and soothing cool temperature over an extended period of time.
- Extra Large 12"x21" Includes soft washable fabric cover to keep skin comfortable & dry from condensation.
- Recommended by doctors for preventing injuries or post surgery recovery. Stays cold up to 45 minutes.
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1 now from \$23.99

Report product problem or violation

\$23.99

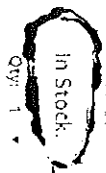
& **FREE Shipping** on orders over \$25 shipped by Amazon. Details

Arrives **Oct 8 - 11**

Fastest delivery: Tomorrow

Order within 19 hrs 30 mins

Ⓢ **Back to school - Save now**
11355



Qty: 1



Add to Cart



Buy Now

Sold by IceWraps and fulfilled by Amazon.

FSA or HSA eligible product.

Return complete

Your return is complete. Your refund has been issued. When will I get my refund?

Extra Large Ice Pack for Injuries - Covers Entire Back, Hips, Neck and Spine. Reusable and

Flexible Direct from The Freezer (by Magic Gel)

Sold by: Station Online

\$23.99

Buy it again



OR

SHIP TO

TOTAL
\$31.98

ORDER PLACED
August 21, 2019

valmiki ramani

Track

View

Lea

Writ

ORDER PLACED
August 21, 2019

TOTAL
\$31.98

SHIP TO
valmiki@gmail.com

OR

Return complete
Your return is complete. Your refund has been issued. When will I get my refund?

Track

View

Learn


Write

Extra Large Tie Back for injuries - covers entire back, Hips, Neck and Spine. Removable and Washable Backrest from the freestanding Hinge Chair

Sold by: See More Online

123.99

Buy it again



iceWraps Flexible Icing Compress for
Therapy 12"x21" Reusable Oversize
Multipurpose Cold Clay Pack for Back,
Sciatica, Knee, Hip Pain Relief - Includ...

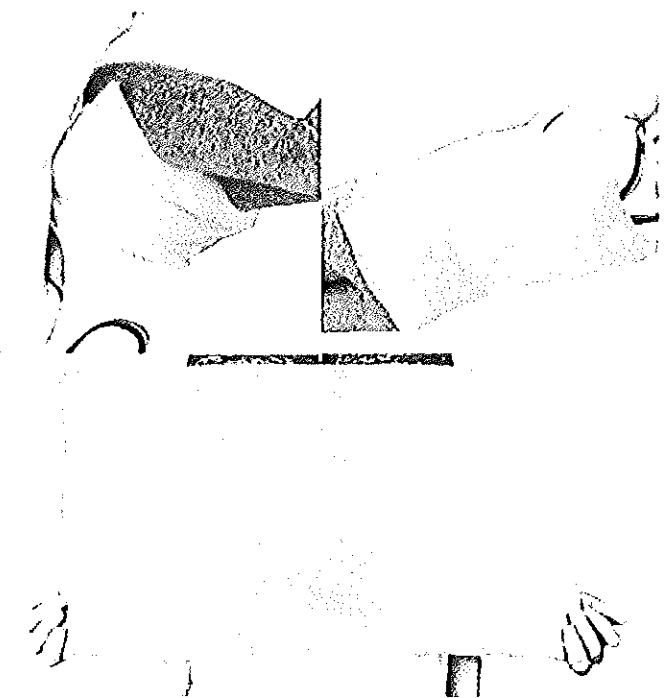
209

523.99

Get it as soon as Tomorrow, Oct 3

FREE Shipping on orders over \$25 shipped by Amazon

FSA or HSA eligible



Amazon.com Customer Service <cs-reply@amazon.com>
to me

Mon, Sep 9, 3:21 PM (15 days ago)

Hello,

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If yes, please click here:

http://www.amazon.com/gp/help/survey?pf_rd_p=8413D0601H0L1&pf_rd_r=11

If no, please click here:

http://www.amazon.com/gp/help/survey?pf_rd_p=A413D06G01HC116&pf_rd_r=116

Best Regards.

Rain song

Amazon.com

Your feedback is helping us build Earth's Most Customer-Centric Company.

<http://www.amazon.com/your-abcoul>

[Print this page on your device](#)

Order Placed: August 21, 2019
Amazon.com order number: 111-8674163-5979409
Order Total: \$31.98

Shipped on August 27, 2019

Items Ordered	Price
1 of: <i>The Vitamin Shoppe Lactase Enzyme 125MG, Supports Lactase or Dairy Digestion, Natural Support for Healthy Digestion (100 Softgels)</i> Sold by: The Vitamin Shoppe (seller profile)	\$7.99
Condition: New	
1 of: <i>Extra Large Ice Pack for Injuries - Covers Entire Back, Hips, Neck and Spine. Reusable and Flexible Direct from The Freezer (by Magic Gel)</i> Sold by: Stretton Online (seller profile)	\$23.99
Condition: New	

Shipping Address:

valmiki ramani
139-05 85 dr
6d
briarwood, ny 11435
United States

Item(s) Subtotal: \$31.98
Shipping & Handling: \$8.72
Free Shipping: -\$8.72

Total before tax: \$31.98
Sales Tax: \$0.00

Shipping Speed:

FREE Shipping

Total for This Shipment: \$31.98

Payment information

Payment Method:

MasterCard | Last digits: 3340

Item(s) Subtotal: \$31.98
Shipping & Handling: \$8.72
Free Shipping: -\$8.72

Billing address

valmiki ramani
139-05 85 dr
6d
briarwood, ny 11435
United States

Total before tax: \$31.98
Estimated tax to be collected: \$0.00

Grand Total: \$31.98

Credit Card transactions

MasterCard ending in 3340: August 27, 2019: \$31.98

To view the status of your order, return to [Order Summary](#).

Civil Court of the City of New York
County of Queens

Index Number: **CV-031556-19/QU**

VALMIKI RAMANI
Plaintiff(s)
-against-
AMAZON.COM
Defendant(s)

**SUMMONS WITH ENDORSED
COMPLAINT**
BASIS OF VENUE: Plaintiff's residence

Plaintiff's Address (s) :
VALMIKI RAMANI
139-05 85 DR
APT 6D
BRIARWOOD, NY 11435

To the named defendant (s)
AMAZON.COM (Deft), at 410 TERRY AVE N, Seattle, WA 98109

YOU ARE HEREBY SUMMONED to appear in the Civil Court of the City of New York, County of Queens at the office of the Clerk of the said Court at **89-17 Sutphin Boulevard** in the **County of Queens, City and State of New York**, within the time provided by law as noted below and to file your answer to the (endorsed summons) (annexed complaint) * with the Clerk; upon your failure to answer, judgment will be taken against you for the total sum of **\$5,000.00** and interest as detailed below. Plaintiff's work sheet may be attached for additional information if deemed necessary by the clerk.

Date: **September 17, 2019**

Alia Razzaq
Chief Clerk

ENDORSED COMPLAINT

The nature and the substance of the plaintiff's cause of action is as follows: **Personal Injuries; Other: Defective product for \$5,000.00 with interest from 09/06/2019**

****NOTE TO THE DEFENDANT***

- A) If the summons is served by its delivery to you personally within the City of New York, you must appear and answer within TWENTY days after such service; or*
B) If the summons is served by delivery to any person other than you personally, or is served outside the City of New York, or by publication, or by any means other than personal delivery to you within the City of New York, you are allowed THIRTY days after the proof of service thereof is filed with the Clerk of this Court within which to appear and answer.
C) Following CPLR 321(a) corporations must be represented by an attorney.

**** NOTE TO THE SERVER OF THE SUMMONS***

The person who serves the summons should complete the Affidavit of Service and shall file it in the Clerk's Office in the county where the action is brought.

PLAINTIFF'S CERTIFICATION
(See 22NYCRR, Section 130-1.1a)

SIGN NAME:
PRINT NAME:


VALMIKI RAMANI

HAZARIAN MEDICAL ASSOCIATES PLLC

4338 44TH STREET SUNNYSIDE NEW YORK 11104

7287862734

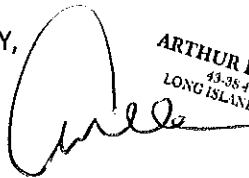
RE: RAMANI, VALMIKI

DOB 11/24/1948

TO WHOM IT MAY CONCERN:

THE ABOVE PATIENT IS UNDER MY MEDICAL CARE FOR MULTIPLE MEDICAL PROBLEMS SEEN IN MY OFFICE ON 09/16/19 FOR ACUTE CONTACT DERMATITIS INVOLVING HIS LEFT FLANK AND ABDOMEN RELATED TO THE LEAKAGE OF AN ICE PACK USED BY PATIENT IN ORDER TO ALLEVIATE PAIN IN THE AREA SEVERAL DAYS AGO. PHYSICAL EXAM REVEALS REDNESS, INFLAMMATION, AND TENDERNESS. TOPICAL TREATMENTS WERE ADVISED. PLEASE CONTACT ME IF YOU HAVE ANY FURTHER QUESTIONS OR CONCERNS.

SINCERELY,



ARTHUR HAZARIAN MD.
43-38 44th STREET
LONG ISLAND CITY, NY 11104

ARTHUR HAZARIAN MD

09/16/2019

Exhibit "A"

TRANSMISSION VERIFICATION REPORT

TIME : 09/17/2019 15:32
NAME :
FAX :
TEL :
SER.# : U63274M6J379882

DATE, TIME	09/17 15:29
FAX NO./NAME	12129995899
DURATION	00:02:47
PAGE(S)	08
RESULT	OK
MODE	STANDARD
	ECM

TRANSMISSION VERIFICATION REPORT

TIME : 09/17/2019 15:10
NAME :
FAX :
TEL :
SER.# : U63274M6J379882

DATE, TIME	09/17 15:09
FAX NO./NAME	12062667010
DURATION	00:01:22
PAGE(S)	08
RESULT	OK
MODE	STANDARD
	ECM

Civil Court of the City of New York
County of Queens

Index no: CV-026077-19/QU

VALMIKI RAMANI

Plaintiff(s)

-against-

AMAZON.COM

Defendant(s)

Affidavit of Service of Summons
with Endorsed Complaint
(Personal and Corporate)

State of New York, County of Queens ss:

Zlata Akilova
(Name of Server)

, being duly sworn, deposes and says:

I am over 18 years of age and not a party to this action.

At _____, AM/PM, on 07/29/19 at 139-09 84th DE, Briarwood, NY 11435
(Time) (Date) (Address)

in the County of Queens, City/State of New York, I served the attached
(Name of County)

SUMMONS WITH ENDORSED COMPLAINT in this matter on Amazon.com
(Name of Defendant as Shown Above)

by delivering the said SUMMONS to:

Fax (206) 266-7010 subpoena - civil@amazon.com who is:
(Name of actual person with whom the SUMMONS was left)

☐ The said defendant in person,

or,

☐ known to me to be the _____ of the Amazon Civil Process
(Title) (Corporation/Partnership)

Description of Individual Served in Person:

Sex: _____ Color of Skin: _____ Color of Hair: _____
Approximate Age: _____ Approximate Weight: _____ Approximate Height: _____

Sworn to before me this 29 day of 07, 20 19

Sion Akilov
(Notary Public)

(Signature of Deponent)

AKILOV SION
Notary Public, State of New York
Reg. No. 01AK6045819
Qualified in Queens County
Commission Expires July 31, 2022

Civil Court of the City of New York
County of Queens

VALMIKI RAMANI

Plaintiff(s)

-against-

AMAZON.COM

Defendant(s)

Index no: CV-031556-19/QU

Affidavit of Service of Summons
with Endorsed Complaint
(Personal and Corporate)

State of New York, County of Queens ss: -

Zlata Aki'lova

(Name of Server)

, being duly sworn, deposes and says:

I am over 18 years of age and not a party to this action.

At _____, AM/PM, on 09/17/19 at 139-09 84th Drive 1A Briarwood, NY 11435
(Time) (Date) (Address)

in the County of Queens, City/State of New York, I served the attached
(Name of County)

SUMMONS WITH ENDORSED COMPLAINT in this matter on Amazon.com
(Name of Defendant as Shown Above)

by delivering the said SUMMONS to:

Fax (206) 266-7010 subpoena-civil@Amazon.com who is:
(Name of actual person with whom the SUMMONS was left)

☐ The said defendant in person,

or,

☐ known to me to be the _____ of the Amazon Civil Process
(Title) (Corporation/Partnership)

Description of Individual Served in Person:

Sex: _____ Color of Skin: _____ Color of Hair: _____
Approximate Age: _____ Approximate Weight: _____ Approximate Height: _____

Sworn to before me this 17 day of 9, 20 19

(Signature of Deponent)

(Notary Public)

AKILOV SION
Notary Public, State of New York
Reg. No. 01AK6045819
Qualified in Queens County
Commission Expires July 31, 2022

CIVIL COURT OF THE CITY OF NEW YORK
COUNTY OF _____: PART

Index No. CV-031556-19/P4

NALMIKI Ramani Petitioner,

AFFIDAVIT OF SERVICE

~~BY MAIL~~

EMAIL

-against-

AMAZON.COM
Respondent.

STATE OF NEW YORK
COUNTY OF Queens

Sion Zlata Akilova being duly sworn,
deposes and says:

I am over 18 years of age and not a party to this action. On 09/19/19

I served Geoffrey Brownell Amazon Legal Agent
upon geoffrey.brownell@dwt.com, the _____ in this
Emailing
proceeding, by mailing a true copy of the attached papers, enclosed and properly sealed in a

postpaid envelope, which I deposited in an official depository under the exclusive care and

custody of the United States Postal Services within the State of New York addressed to

Geoffrey Brownell@dwt.com the New York Legal Agent
at: Davis Wright Tremaine LLP 125 Ave of Americas
21st FL NY NY 10020

Signature: Sion Zlata Akilova

Sworn to before me this 19 day of 9 2019

[Signature]
Notary Public or

ZLATA AKILOVA
Notary Public, State of New York
Reg. No. 01AK6355611
Qualified in Queens County
Commission Expires 03/13/2021

HAZARIAN MEDICAL ASSOCIATES PLLC

4338 44TH STREET SUNNYSIDE NEW YORK 11104

7287862734


RE: RAMANI, VALMIKI

DOB 11/24/1948

TO WHOM IT MAY CONCERN:

THE ABOVE PATIENT IS UNDER MY MEDICAL CARE FOR MULTIPLE MEDICAL PROBLEMS SEEN IN MY OFFICE ON 09/25/19 C/O SEVERAL NEW SKIN LESIONS INVOLVING HIS LEFT FLANK AND ABDOMEN OVERLYING THE AREA WITH PREVIOUS LEAKAGE OF AN ICE PACK USED BY PATIENT IN ORDER TO ALLEVIATE PAIN IN THE AREA OCCURRING APPROXIMATELY TWO WEEKS AGO. PHYSICAL EXAM REVEALS SEVERAL AREAS OF VARYING SIZES OF HYPERPIGMENTED DERMATITIS OVERLYING LEFT ANTERIOR LOWER ABDOMEN, LEFT FLANK AND BUTTOCKS. TOPICAL TREATMENTS ARE ADVISED. PLEASE CONTACT ME IF YOU HAVE ANY FURTHER QUESTIONS OR CONCERNS.

SINCERELY



ARTHUR HAZARIAN MD.
4338 44TH STREET
SUNNYSIDE CITY, NY 11104

ARTHUR HAZARIAN MD

09/25/2019

County of Queens: PART

Volmiki Ramani petitioners
against

Amazon - Com respondent

INDEX NO

CV-03156-19/QU

AFFIDAVIT OF SERVICE

State of New York County of Queens:

Email

Z/ATA Aki'ova
deposes and says:

being duly sworn

I am over 18 years old and not a party to this action.

ON 9-25-19 I served Geoffrey Brownell

Defendant Legal agent in New York via "Geoffrey Brownell @ DWI.

Com" and Defendant Amazon - Com via Email

at "Subena - civil @ Amazon Com" commencing

Summons and Complaint and exhibits

Service to Defendant and defendant's

agent cannot be done via personal service

and only through via Fax and Email.

Signature:

Sworn to before me 25 day of 9-2019 x Z/ATA Aki'ova

notary public

BORUKHOV BORIS

Notary Public, State of New York
No. 01806347793

Qualified in Queens County
Commission Expires 03/09/2020

9/25/19

B. W.

County of Queens

VALMIKI RAMANI
Plaintiff(s)
-against-
AMAZON.COM
Defendant(s)

AMENDED SUMMONS WITH
ENDORSED
COMPLAINT
BASIS OF VENUE: Plaintiff's residence

Plaintiff's Address (s) :
VALMIKI RAMANI
139-05 85 DR
APT 6D
BRIARWOOD, NY 11435

To the named defendant (s)
AMAZON.COM (Deft), at 410 TERRY AVE N, Seattle, WA 98109

YOU ARE HEREBY SUMMONED to appear in the Civil Court of the City of New York, County of Queens at the office of the Clerk of the said Court at 89-17 Sutphin Boulevard in the County of Queens, City and State of New York, within the time provided by law as noted below and to file your answer to the (endorsed summons) (annexed complaint) * with the Clerk; upon your failure to answer, judgment will be taken against you for the total sum of \$25,000.00 and interest as detailed below. Plaintiff's work sheet may be attached for additional information if deemed necessary by the clerk.

Date: September 17, 2019

Alia Razzaq
Chief Clerk

ENDORSED COMPLAINT

The nature and the substance of the plaintiff's cause of action is as follows: NEW DEVELOPMENT OF PHYSICAL DAMAGE TO MY BODY-SKIN HAS DEVELOPED AS A RESULT OF DEFECTIVE PRODUCT SOLD - LEAKING TOXIC GEL ON MY SKIN. I'AM ASKING THE MAXIMUM THIS COURT ALLOWS OF \$25,000.00

***NOTE TO THE DEFENDANT**

A) If the summons is served by its delivery to you personally within the City of New York, you must appear and answer within **TWENTY** days after such service; or

B) If the summons is served by delivery to any person other than you personally, or is served outside the City of New York, or by publication, or by any means other than personal delivery to you within the City of New York, you are allowed **THIRTY** days after the proof of service thereof is filed with the Clerk of this Court within which to appear and answer.

C) Following CPLR 321(a) corporations must be represented by an attorney.

*** NOTE TO THE SERVER OF THE SUMMONS**

The person who serves the summons should complete the Affidavit of Service and shall file it in the Clerk's Office in the county where the action is brought.

PLAINTIFF'S CERTIFICATION
(See 22NYCRR, Section 130-1.1a)

SIGN NAME: _____
PRINT NAME: VALMIKI RAMANI

Civil Court of the City of New York
County of Queens

Index no: CV-026077-19/QU

VALMIKI RAMANI

Plaintiff(s)

-against-

AMAZON.COM

Defendant(s)

Affidavit of Service of Summons
with Endorsed Complaint
(Personal and Corporate)

State of New York, County of Queens ss:

Zlata Akiлова

(Name of Server)

, being duly sworn, deposes and says:

I am over 18 years of age and **not a party** to this action.

At _____, AM/PM, on 07/29/19 at 139-09 84th Dr, Briarwood, NY 11435
(Time) (Date) (Address)

in the County of Queens, City/State of New York, I served the attached
(Name of County)

SUMMONS WITH ENDORSED COMPLAINT in this matter on Amazon.com
(Name of Defendant as Shown Above)

by delivering the said SUMMONS to:

Fax (206) 266-7010 subpoena - civil@amazon.com who is:
(Name of actual person with whom the SUMMONS was left)

☐ The said defendant in person,
or,

☐ known to me to be the _____ of the Amazon Civil Process
(Title) (Corporation/Partnership)

Description of Individual Served in Person:

Sex: _____ Color of Skin: _____ Color of Hair: _____
Approximate Age: _____ Approximate Weight: _____ Approximate Height: _____

Sworn to before me this 29 day of 07, 20 19

Sien Aki
(Notary Public)

(Signature of Deponent)

AKILOV SION
Notary Public, State of New York
Reg. No. 01AK6045819
Qualified in Queens County
Commission Expires July 31, 2022

Civil Court of the City of New York
County of Queens

Index no: CV-026077-19/QU

VALMIKI RAMANI

Plaintiff(s)

-against-

AMAZON.COM

Defendant(s)

Affidavit of Service of Summons
with Endorsed Complaint
(Personal and Corporate)

State of New York, County of Queens ss:

Zlata Akirova

(Name of Server)

, being duly sworn, deposes and says:

I am over 18 years of age and not a party to this action.

At _____, AM/PM, on 07/29/19 at 139-09 84th Dr, Briarwood, NY 11435
(Time) (Date) (Address)

in the County of Queens, City/State of New York, I served the attached
(Name of County)

SUMMONS WITH ENDORSED COMPLAINT in this matter on Amazon.com
(Name of Defendant as Shown Above)

by delivering the said SUMMONS to:

Fax (206) 266-7010 subpoena - civil@amazon.com who is:
(Name of actual person with whom the SUMMONS was left)

☐ The said defendant in person,
or,

☐ known to me to be the _____ of the Amazon Civil Process
(Title) (Corporation/Partnership)

Description of Individual Served in Person:

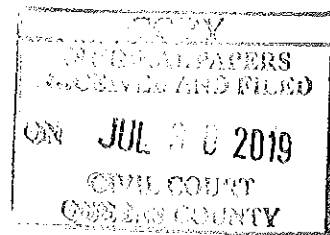
Sex: _____ Color of Skin: _____ Color of Hair: _____
Approximate Age: _____ Approximate Weight: _____ Approximate Height: _____

Sworn to before me this 29 day of 07, 20 19

Sieu Akirova
(Notary Public)

(Signature of Deponent)

AKILOV SION
Notary Public, State of New York
Reg. No. 01AK6045819
Qualified in Queens County
Commission Expires July 31, 2022



CIVIL COURT OF City of New York:

County of Queens

Valmiki Ramani
PlaintiffAmazon.com
defendantINDEX NO
CV-031556-19/PL
MOTION Reply

To the defense attorney and DWT LLP,
you content in your motion is
pathetic, to dig into my legal history
and bring to the court's attention that
I have/had six lawsuits, but principally
mention that I sued President B. Obama
without stating the facts as the New
York Post wrote it, Obama a sleaze,
and google this and thrusting this
in the fore front of your motion is
disgusting, Let me enlighten you!!

2) 2010 In the Gulf of Mexico BP US had
an oil spill and could not stop or
contain it, it was on all times on TV
showing the oil coming out the broken
well, and crude oil polluting the
entire region the US Government could
not stop it, and BP US could not,
the company's chairman left and went
sailing on the Thames River while

the American Homeland suffered. Obama's
 Government made a national appeal
 for any one who had any idea
 to put a stop to the well etc, to
 come forward. I previously worked
 as a Officer Cadet on a Canadian Merchant
 ship who ran one end crude oil between
 South America and Trinidad W.I. I saw
 crude oil and the damage it was doing to
 the beautiful bay and thought up of
 a way to clean it up, you could just
 put a match to it and it will burn
 it's crude unprocessed oil, I decided
 that it had to be made combustible by infusing
 it with an agent - kerosene, alcohol etc
 then setting it aflame. I also devised
 a method to cap the well, I made diagrams
 of this and along with an IMPLIED
 CONTRACT, embodied in a Letter
 I sent it to Obama, Two weeks later
 Oval office speech he announced they
 had began to burn the oil, did you

brilliant people wonder how it was you stopped seeing T.V. pix of the gushing oil? I then wrote Obama requesting 1.5 million for my efforts, he refused to pay me despite BP US was going to pay the US government Billions in compensation, so I sued him even in federal court when Chief Justice C. Mac Mohan revealed he had immunity. Look at the google article and see what and how the New York Post describes him, so you big shot lawyers, I sue when I have a valid right to! So let this Civil Court Judge on S. T. uphin Blvd buy into it I Sue!!!

(3) July an Amazon delivery person kept pressing my doorbell, asked why he kept doing it, he said I am an Amazon delivery man, I asked him you have a delivery for me, he said

No, then I said to him why the hell they
 you are running my door he, I was
 sedated and resting, he then slammed
 the heavy box into my right shoulder
 and kneed me in the right leg to get
 past me - the door, into the lobby, after
 dumping the box he accosted me and with
 fury said he would "kick my ass" - verbatim
 I filed a lawsuit against Amazon, after
 their office told me they do not accept
 PERSONAL Service, it had to
 be FAXed - or Email or both -
 I did so and DWG replied and an out
 of court settlement of \$2,000 was made.

4) Two months later: a gel pack I purchased
 from the defendant leaked onto my
 body - skin irritably causing contact
 dermatitis, I filed suit, then between
 the week I was to return to my doctor's office
 for a followup, large (3) brown skin
 large patches appeared, I amended the Suit.

Now in this Law Suit for the damage to my person Amazon defense is claiming,

(1) We sell it damage the user, but we are not responsible, despite in the add it says "IN STOCK", which means it's a product Amazon buys from a manufacture and sells, and this being so there is no contract between me the buyer, and Amazon the seller, that I should seek out the manufacture and sue the also not so, this contract of sale was between myself and Amazon who carried the product in stock, it was not shipped from a third party

(2) Service - Two months before the gel spill, I successful sued Amazon using as to let to email Subpoena-Civil Amazon.com; it worked DWT Replied - their legal people then TWO months after the gel spill, I faxed not Emailed

The second law suit the same way as the first, and DWT responded and they are saying Amazon was not properly served, why then did they replied if the email address Sawspeone. Civil @ Amazon-Com was not valid? No they have changed their process service fax number and from Email to regular mail, to get out of this Law suit, it's not going to fly !!!

6) Why does Amazon do not think they owe me compensation for the damage to my body the product did to my body, is it because they are endowed to keep all monies and keep making monies even if their customer suffers injury. Well it's not going to happen Amazon is not getting out of this, and I will no reply to all the other legal jargon

(6)

Contained in this motion, because the
Judge in this case in the Civil
Court will have to see the facts
and award me compensation.
If not, this will go to a
higher court, Amazon is worth
\$140 Billion dollars and they are
running greedily from a case of
this size!

Tary M Reeves
DWT LLP
1251 6th Ave.

VALmiki Ramani
Plaintiff
Valmiki Ramani

my my